



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

REMOVAL ACTION BRANCH

I D E A L C O O P E R A G E S I T E
A D M I N I S T R A T I V E R E C O R D

Prepared by:

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Prepared for:

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USEPA Removal Action Branch
Edison, New Jersey

May, 1991

I D E A L C O O P E R A G E S I T E
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

Administrative Records in Local Repositories

The "Administrative Record" is the collection of documents which forms the basis for the selection of a response action at a Superfund site. Under Section 113(k) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), EPA is required to establish an administrative record for every Superfund response action and to make a copy of the administrative record available at or near the site.

The administrative record file must be reasonably available for public review during normal business hours. The record file should be treated as a non-circulating reference document. This will allow the public greater access to the volumes and also minimize the risk of loss or damage. Individuals may photocopy any documents contained in the record file, according to the photocopying procedures at the local repository.

The documents in the administrative record file may become damaged or lost during use. If this occurs, the local repository manager should contact the EPA Regional Office for replacements. Periodically, EPA may send supplemental volumes and indexes directly to the local repository. These supplements should be placed with the initial record file.

The administrative record file will be maintained at the local repository until further notice. Questions regarding the maintenance of the record file should be directed to the EPA Regional Office.

The Agency welcomes comments at any time on documents contained in the administrative record file. Please send any such comments to Mr. J. Daniel Harkay, On-Scene Coordinator, Removal Action Branch, USEPA Region II, 2890 Woodbridge Avenue, Edison, New Jersey 08837.

For further information on the administrative record file, contact J. Daniel Harkay at (908) 321-6614.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

Ideal Cooperage Administrative Record
List of Documents

The list of documents contains the following information about each document:

- * Document number
- * Title of Document - One or two line synopsis of contents of document
- * Author - Name and affiliation
- * Recipient - Name and affiliation
- * Date of Document - Date document was created or transmitted.

Note: Items in the Administrative Record are for public access, and should be removed from the file only for copying. The cost of reproduction of the documents in the file are the responsibility of the person requesting the copy.

Document #: ICS 2.3.0020 Date: None
Title: Sampling Results Summary for Drummed Solid Material
Author: Peter Di Pasca, Jr., TAT Project Manager, Roy F.
Weston, Inc.
Recipient: Dan Harkay, OSC, USEPA Region II

Document #: ICS 2.4.0010 Date: 09-13-90
Title: Removal Site Evaluation and Funding Authorization
for a CERCLA Removal Action - Action Memorandum
Author: Dan Harkay, OSC, USEPA Region II
Recipient: Richard L. Caspe, P.E., Director, USEPA-ERRD

Document #: ICS 2.5.0010 Date: 2-91
Title: Work Plan
Author: Peter Di Pasca, Jr., TAT Project Manager, Roy F.
Weston, Inc.
Recipient: Dan Harkay, OSC, USEPA Region II

Document #: ICS 2.6.0010 Date: 03-28-91
Title: Site Safety Plan
Author: Peter Di Pasca, Jr., TAT Project Manager, Roy F.
Weston, Inc.
Recipient: Dan Harkay, OSC, USEPA Region II

Document #: ICS 3.1.0010 Date: 12-21-89
Title: (Cover Letter for Attached "Consent for Access to
Property")
Author: Debora S. Laurano, Brach, Eichler, Rosenberg
Recipient: Dan Harkay, OSC, USEPA Region II

Document #: ICS 3.1.0020 Date: 12-04-90
Title: (Response to Draft Administrative Order on Consent)
Author: William J. Friedman, Esq., Brach, Eichler,
Rosenberg
Recipient: Joseph A. Siegel, Assistant Regional Counsel, USEPA
Region II

Document #: ICS 3.2.0010 Date: 11-02-90
Title: Draft Administrative Order on Consent
Author: Joseph A. Siegel, Assistant Regional Counsel, USEPA
Region II
Recipient: William J. Friedman, Esq., Brach, Eichler,
Rosenberg

Document #: ICS 4.1.0010 Date: None
Title: Potential Health Effects for Hazardous Substances
Author: Peter Di Pasca, Jr., TAT Project Manager, Roy F.
Weston, Inc.
Recipient: Dan Harkay, OSC, USEPA Region II

Document #: ICS 5.1.0010 Date: 05-09-91
Title: Notice of Public Availability - Administrative
Record
Author: Peter Di Pasca, Jr., TAT Project Manager, Roy F.
Weston, Inc.
Recipient: The Jersey Journal

Document #: ICS 5.2.0010 Date: 05-08-91
Title: "Barrels to be Rolling from Hillside Dump"
Author: Dan Rosenfeld, Staff Writer, The Jersey Journal
Recipient: The Jersey Journal

Document #: ICS 6.1.0010 Date: None
Title: Technical Sources and Guidance Documents
Author: Not Applicable
Recipient: Not Applicable



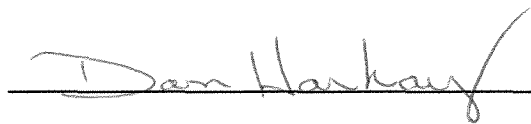
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

CERTIFICATION OF DOCUMENTS
COMPRISING THE ADMINISTRATIVE RECORD


The United States Environmental Protection Agency (USEPA) hereby certifies that the attached documents constitute the administrative record for selection of response actions under the Comprehensive Environmental Response Compensation and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1980, for the Ideal Cooperaage Site, located at 3-25 New York Avenue, Jersey City, Hudson County, New Jersey.

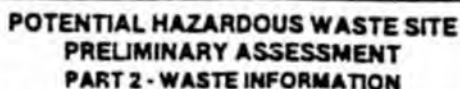
By the United States Environmental Protection Agency:

In witness whereof I have subscribed my
name this 7 day of May, 1991
in Jersey City.



J. Daniel Harkay, USEPA Region II

 POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT		I. IDENTIFICATION 01 STATE <u>NS</u> 02 SITE NUMBER _____	
II. SITE NAME AND LOCATION			
01 SITE NAME (Legal, common, or descriptive name of site) <u>IDEAL COOPERAGE (LOT 10A)</u>		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER <u>NEW YORK AVENUE</u>	
03 CITY <u>JERSEY CITY</u>	04 STATE <u>NS</u>	05 ZIP CODE <u>07302</u>	06 COUNTY <u>HUDSON</u>
09 COORDINATES LATITUDE <u>40°44'15"</u>		LONGITUDE <u>74°02'46"</u>	
10 DIRECTIONS TO SITE (Starting from nearest public road) <u>NSTRAL TO EXIT 142 make left before Holland TUNNEL ENTRANCE, UNDER BRIDGE, MAKE LEFT, MAKE NEXT LEFT ONTO NEW YORK AVG. SITE IS ON LEFT AT BEND IN THE ROAD.</u>			
III. RESPONSIBLE PARTIES			
01 OWNER (if known) <u>MRS. MARIE MONK</u>		02 STREET (Business, mailing, residential) <u>99 PARK AVENUE</u>	
03 CITY <u>NORTH ARLINGTON</u>	04 STATE <u>NS</u>	05 ZIP CODE <u>07032</u>	06 TELEPHONE NUMBER <u>1 1 N/A</u>
07 OPERATOR (if known and different from owner) <u>SAME</u>		08 STREET (Business, mailing, residential)	
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN			
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input type="checkbox"/> A. RCRA 3001 DATE RECEIVED: _____ MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103) DATE RECEIVED: _____ MONTH DAY YEAR <input type="checkbox"/> C. NONE			
IV. CHARACTERIZATION OF POTENTIAL HAZARD			
01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE <u>9/26/89</u> MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input checked="" type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify)	
CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input checked="" type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION <u>1952</u> <u>1981</u> BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN	
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED <u>UNKNOWN / However when in operation, FACILITY RECONTINUED DRUMS FOR THE CHEMICAL INDUSTRY</u>			
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION <u>EXPOSURE, by DIRECT CONTACT SPILLAGE OF MATERIAL INTO THE ENVIRONMENT by VANDALS OR DRUM FAILURE</u>			
V. PRIORITY ASSESSMENT			
01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste information and Part 3 - Description of Hazardous Conditions and Inventory) <input type="checkbox"/> A. HIGH (inspection required promptly) <input checked="" type="checkbox"/> B. MEDIUM (inspection required) <input type="checkbox"/> C. LOW (inspect on time available basis) <input type="checkbox"/> D. NONE (no further action needed, complete current disposition form)			
VI. INFORMATION AVAILABLE FROM			
01 CONTACT <u>Don Horkey</u>		02 OF (Agency/Organization) <u>EPA II</u>	
04 PERSON RESPONSIBLE FOR ASSESSMENT <u>Joe Roca / Don Horkey</u>		05 AGENCY <u>EPA II</u>	06 ORGANIZATION <u>RAB</u>
		07 TELEPHONE NUMBER <u>201 321-6614</u>	08 DATE _____/_____/_____ MONTH DAY YEAR



01 STATE	02 SITE NUMBER
----------	----------------

23

02 SITE NUMBER

01 PHYSICAL STATES (Check all that apply)

- 02 WASTE QUANTITY AT SITE
(Measure of waste quantity
not to be included)

TOWNS

CUBIC YARDS

NO. OF DRUGS

- 03 WASTE CHARACTERISTICS (Check all that apply)

- ☐ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT

- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ☐ H. IGNITABLE

- I. HIGHLY VOLATILE
 J. EXPLOSIVE
 K. REACTIVE
 L. INCOMPATIBLE
 M. NOT APPLICABLE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

[illegible]

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VL SOURCES OF INFORMATION (Car source references: 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 84



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 2 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

25

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: NONE

02 ☐ OBSERVED (DATE: _____)

☒ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

GROUND WATER MAY BE IMPACTED BY SPILLAGE OF
SUBSTANCES ONTO SURFACE SOIL VIA SURFACE RUN OFF.

01 ☒ B. SURFACE WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: NONE

02 ☐ OBSERVED (DATE: _____)

☒ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

SPILLAGE OF MATERIAL ONTO SURFACE MAY RESULT IN
SURFACE WATER CONTAMINATION VIA SURFACE RUN OFF.

01 ☐ C. CONTAMINATION OF AIR

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☒ E. DIRECT CONTACT

03 POPULATION POTENTIALLY AFFECTED: 10-150

02 ☐ OBSERVED (DATE: _____)

☒ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

AREA RESIDENTS WHO VISIT THE PROPERTY MAY BE
EXPOSED TO DRUMMED MATERIALS

01 ☒ F. CONTAMINATION OF SOIL

03 AREA POTENTIALLY AFFECTED: 1 Acre
(Acres)

02 ☐ OBSERVED (DATE: _____)

☒ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

SOIL MAY BE CONTAMINATED AS A RESULT OF
SPILLAGE FROM DRUMS

01 ☐ G. DRINKING WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ H. WORKER EXPOSURE/INJURY

03 WORKERS POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☒ I. POPULATION EXPOSURE/INJURY

03 POPULATION POTENTIALLY AFFECTED: 1-5000

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

AREA IS LOCATED ADJACENT TO A PASSENGER
RAILWAY AND MAJOR ROADWAY.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
US

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (Exclude poisoning of animals)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Spill/leak/overflow resulting in waste release)
03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☒ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☒ POTENTIAL

☐ ALLEGED

Stockpiled drums could be rolled onto adjacent
railroad or industrial properties, releasing materials

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☒ POTENTIAL

☐ ALLEGED

Spillage of materials onto property could result
in contamination of sewers, storm drains etc via runoff.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: 1 - 5,000

IV. COMMENTS

V. SOURCES OF INFORMATION (List specific references, e.g., state files, sampling analysis, reports)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT

REGION

II

SITE NUMBER (as assigned by HQ)

GENERAL INSTRUCTIONS: Complete Sections I and III through XV of this form as completely as possible. Then use the information on this form to develop a Tentative Disposition (Section II). File this form in its entirety in the regional Hazardous Waste Log File. Be sure to include all appropriate Supplemental Reports in the file. Submit a copy of the forms to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME <u>Ideal Luggage LOT 10A</u>		B. STREET (or other identifier) <u>NEW YORK AVENUE</u>	
C. CITY <u>JERSEY CITY</u>	D. STATE <u>NJ</u>	E. ZIP CODE <u>07302</u>	F. COUNTY NAME <u>HUDSON</u>
G. SITE OPERATOR INFORMATION			
1. NAME <u>Mrs. MARIE MONK</u>		2. TELEPHONE NUMBER <u>N/A</u>	
3. STREET <u>99 Park Ave</u>	4. CITY <u>NORTH ARLINGTON</u>	5. STATE <u>NJ</u>	6. ZIP CODE <u>07032</u>
H. REALTY OWNER INFORMATION (if different from operator of site)			
1. NAME		2. TELEPHONE NUMBER	
3. CITY	4. STATE	5. ZIP CODE	

I. SITE DESCRIPTION <u>VACANT PARCEL, Formerly used for Empty Drum Storage From RECONDITIONAL</u>				
J. TYPE OF OWNERSHIP				
<input type="checkbox"/> 1. FEDERAL	<input type="checkbox"/> 2. STATE	<input type="checkbox"/> 3. COUNTY	<input type="checkbox"/> 4. MUNICIPAL	<input checked="" type="checkbox"/> 5. PRIVATE

II. TENTATIVE DISPOSITION (complete this section last)

A. ESTIMATE DATE OF TENTATIVE DISPOSITION (mo., day, & yr.)	B. APPARENT SERIOUSNESS OF PROBLEM
	<input type="checkbox"/> 1. HIGH <input checked="" type="checkbox"/> 2. MEDIUM <input type="checkbox"/> 3. LOW <input type="checkbox"/> 4. NONE
C. PREPARER INFORMATION	
1. NAME <u>Dan Harkley</u>	2. TELEPHONE NUMBER <u>321-6614</u>
3. DATE (mo., day, & yr.) <u>10/23/89</u>	

III. INSPECTION INFORMATION

A. PRINCIPAL INSPECTOR INFORMATION	
1. NAME <u>Dan Harkley</u>	2. TITLE <u>OSC</u>
3. ORGANIZATION <u>EPA II</u>	4. TELEPHONE NO. (area code & no.) <u>321-6614</u>

B. INSPECTION PARTICIPANTS		
1. NAME	2. ORGANIZATION	3. TELEPHONE NO.
<u>Joe Rotola</u>	<u>EPA II</u>	

C. SITE REPRESENTATIVES INTERVIEWED (corporate officials, workers, residents)		
1. NAME	2. TITLE & TELEPHONE NO.	3. ADDRESS
<u>N/A</u>		

III. INSPECTION INFORMATION (continued)

D. GENERATOR INFORMATION (sources of waste)

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE GENERATED
N/A			

E. TRANSPORTER/HAULER INFORMATION

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE TRANSPORTED
N/A			

F. IF WASTE IS PROCESSED ON SITE AND ALSO SHIPPED TO OTHER SITES, IDENTIFY OFF-SITE FACILITIES USED FOR DISPOSAL.

1. NAME	2. TELEPHONE NO.	3. ADDRESS
N/A		

G. DATE OF INSPECTION

(mo., day, & yr.)
9/26/89

H. TIME OF INSPECTION

2:30 pm

I. ACCESS GAINED BY: (credentials must be shown in all cases)

☒ 1. PERMISSION☐ 2. WARRANT

Jersey City

J. WEATHER (describe)

IV. SAMPLING INFORMATION

1. Mark 'X' for the types of samples taken and indicate where they have been sent e.g., regional lab, other EPA lab, contractor, etc. and estimate when the results will be available.

1. SAMPLE TYPE	2. SAMPLE TAKEN (mark 'X')	3. SAMPLE SENT TO:	4. DATE RESULTS AVAILABLE
a. GROUNDWATER			
b. SURFACE WATER			
c. WASTE			
d. AIR			
e. RUNOFF			
f. SPILL			
g. SOIL (Historic Sampling)	X	Compuchem / skinner	6/89
h. VEGETATION			
i. OTHER (specify)			

B. FIELD MEASUREMENTS TAKEN (e.g., radioactivity, explosivity, PH, etc.)

1. TYPE	2. LOCATION OF MEASUREMENTS	3. RESULTS
HNU	ON SITE	Background

IV. SAMPLING INFORMATION (continued)

C. PHOTOS

1. TYPE OF PHOTOS

☒ a. GROUND ☐ b. AERIAL

2. PHOTOS IN CUSTODY OF:

Dan Harkley OSC

D. SITE MAPS

☒ YES. SPECIFY LOCATION OF MAPS

SITE SKETCH

E. COORDINATES

1. LATITUDE (deg.-min.-sec.)

40° 44' 15"

2. LONGITUDE (deg.-min.-sec.)

74° 2' 46"

V. SITE INFORMATION

A. SITE STATUS

☐ 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)

☐ 2. INACTIVE (Those sites which no longer receive wastes.)

☒ 3. OTHER (specify):

Property was used for (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

Storage of Empty Drums

B. IS GENERATOR ON SITE?

☒ 1. NO

☐ 2. YES (specify generator's four-digit SIC Code):

C. AREA OF SITE (in acres)

2 ACRES

D. ARE THERE BUILDINGS ON THE SITE?

☒ 1. NO

☐ 2. YES (specify):

VI. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

X	A. TRANSPORTER	X	B. STORER	X	C. TREATER	X	D. DISPOSER
	1. RAIL		1. PILE		1. FILTRATION		1. LANDFILL
	2. SHIP		2. SURFACE IMPOUNDMENT		2. INCINERATION		2. LANDFARM
	3. BARGE	<input checked="" type="checkbox"/>	3. DRUMS		3. VOLUME REDUCTION		3. OPEN DUMP
	4. TRUCK		4. TANK, ABOVE GROUND	<input checked="" type="checkbox"/>	4. RECYCLING/RECOVERY		4. SURFACE IMPOUNDMENT
	5. PIPELINE		5. TANK, BELOW GROUND		5. CHEM./PHYS./TREATMENT		5. MIDNIGHT DUMPING
	6. OTHER (specify):		6. OTHER (specify):		6. BIOLOGICAL TREATMENT		6. INCINERATION
			Empty Drum Storage Area		7. WASTE OIL REPROCESSING		7. UNDERGROUND INJECTION
					8. SOLVENT RECOVERY		8. OTHER (specify):
					9. OTHER (specify):		

E. SUPPLEMENTAL REPORTS: If the site falls within any of the categories listed below, Supplemental Reports must be completed. Indicate which Supplemental Reports you have filled out and attached to this for..

- ☒ 1. STORAGE ☐ 2. INCINERATION ☐ 3. LANDFILL ☐ 4. SURFACE IMPOUNDMENT ☐ 5. DEEP WELL
☐ 6. CHEM/BIO/PHYS TREATMENT ☐ 7. LANDFARM ☐ 8. OPEN DUMP ☐ 9. TRANSPORTER ☐ 10. RECYCLOR/RECLAIMER

VII. WASTE RELATED INFORMATION

A. WASTE TYPE

☒ 1. LIQUID

☒ 2. SOLID

☐ 3. SLUDGE

☐ 4. GAS

B. WASTE CHARACTERISTICS

☐ 1. CORROSIVE

☐ 2. IGNITABLE

☐ 3. RADIOACTIVE

☐ 4. HIGHLY VOLATILE

☐ 5. TOXIC

☐ 6. REACTIVE

☐ 7. INERT

☐ 8. FLAMMABLE

☐ 9. OTHER (specify):

UNKNOWN

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

No

Continued From Front

VII. WASTE RELATED INFORMATION (continued)

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present. unknown

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY, PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER(specify):	(2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER(specify):	(3) CAUSTICS	(3) MILLING/MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE		(4) PESTICIDES	(4) FERROUS SMELTING WASTES	(4) MUNICIPAL	
(5) OTHER(specify):		(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER(specify):	
		(6) CYANIDE	<input checked="" type="checkbox"/> (6) OTHER(specify):		
	(7) PHENOLS				
	(8) HALOGENS				
		(9) PCB			
		(10) METALS			
		(11) OTHER(specify):			

(10) drums
 30 GAL DR.
 APPROX
 (10) 30 GAL
 DRUMS,
 BLACK
 SOIL LIKE
 MATERIAL

D. LIST SUBSTANCES OF GREATEST CONCERN WHICH ARE ON THE SITE (place in descending order of hazard)

1. SUBSTANCE	2. FORM (mark 'X')			3. TOXICITY (mark 'X')				4. CAS NUMBER	5. AMOUNT	6. UNIT
	a. SOLID	b. LIQ.	c. VAPOR	a. HIGH	b. MED.	c. LOW	d. NONE			
<u>unknown</u>										

VIII. HAZARD DESCRIPTION

FIELD EVALUATION HAZARD DESCRIPTION: Place an 'X' in the box to indicate that the listed hazard exists. Describe the hazard in the space provided.

☒ A. HUMAN HEALTH HAZARDS

POTENTIAL FOR DIRECT CONTACT VIA EXPOSURE
TO DRUMMED MATERIALS

VIII. HAZARD DESCRIPTION (continued)

☒ B. NON-WORKER INJURY/EXPOSURE

Possible, Resulting Resulting From Direct
Contact with Contents of Drums.

☐ C. WORKER INJURY/EXPOSURE

N/A

☐ D. CONTAMINATION OF WATER SUPPLY

N/A

☐ E. CONTAMINATION OF FOOD CHAIN

N/A

☒ F. CONTAMINATION OF GROUND WATER

Possible Contamination via Spillage From Leaky
Drums.

☒ G. CONTAMINATION OF SURFACE WATER

Potential for Surface Water Contamination
due to Leakage From Deteriorated Drums

VIII. HAZARD DESCRIPTION (continued)

☐ H. DAMAGE TO FLORA/FAUNA☐ I. FISH KILL

N/A

☐ J. CONTAMINATION OF AIR

N/A

☐ K. NOTICEABLE ODORS

N/A

☒ L. CONTAMINATION OF SOIL

POTENTIAL, RESULTING FROM, LEAKAGE OF
DRUMS CONTAINING MATERIAL.

☐ M. PROPERTY DAMAGE

N/A

VIII. HAZARD DESCRIPTION (continued)

☐ H. FIRE OR EXPLOSION

NOT SUSPECTED AT THIS TIME

☒ O. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUID

THE DRUMS ON SITE ARE IN POOR CONDITION,
SPILLS AND LEAKS CAN OCCUR.

☐ P. SEWER, STORM DRAIN PROBLEMS

NOT SUSPECTED OR ANTICIPATED AT THIS TIME,
HOWEVER THE POTENTIAL EXISTS.

☐ Q. EROSION PROBLEMS

N/A

☒ R. INADEQUATE SECURITY

CHAIN LINK FENCE AROUND ALL PROPERTY/
BOUNDARIES EXCEPT NORTH AREA

☐ S. INCOMPATIBLE WASTES

N/A

VIII. HAZARD DESCRIPTION (continued)

☒ T. MIDNIGHT DUMPING

Dumping of Residential + Construction Debris
No longer a problem since, Fence was installed.

☒ U. OTHER (specify):

Physical Threat of Drums, Rolling onto
Adjacent Rail Road Tracks, or ~~Along Railroad~~
Falling on to NEIGHBORING RESIDENTS

IX. POPULATION DIRECTLY AFFECTED BY SITE

A. LOCATION OF POPULATION	B. APPROX. NO. OF PEOPLE AFFECTED	C. APPROX. NO. OF PEOPLE AFFECTED WITHIN UNIT AREA	D. APPROX. NO. OF BUILDINGS AFFECTED	E. DISTANCE TO SITE (specify units)
1. IN RESIDENTIAL AREAS	—	200 - 500	3	1,000'
2. IN COMMERCIAL OR INDUSTRIAL AREAS	—	50 - 100	2	100'
3. IN PUBLICLY TRAVELLED AREAS	—	500 - 5,000	N/A	50' - 100'
4. PUBLIC USE AREAS (parks, schools, etc.)	—	NONE	NONE	N/A

X. WATER AND HYDROLOGICAL DATA

A. DEPTH TO GROUNDWATER (specify unit) 50 - 100'	B. DIRECTION OF FLOW EASTERLY	C. GROUNDWATER USE IN VICINITY No
D. POTENTIAL YIELD OF AQUIFER UNKNOWN	E. DISTANCE TO DRINKING WATER SUPPLY (specify unit of measure) UNKNOWN	F. DIRECTION TO DRINKING WATER SUPPLY UNKNOWN
G. TYPE OF DRINKING WATER SUPPLY		
<input type="checkbox"/> 1. NON-COMMUNITY < 15 CONNECTIONS*	<input checked="" type="checkbox"/> 2. COMMUNITY (specify town): <u>Jersey City</u>	
<input checked="" type="checkbox"/> 3. SURFACE WATER	<input type="checkbox"/> 4. WELL	

X. WATER AND HYDROLOGICAL DATA (continued)

H. LIST ALL DRINKING WATER WELLS WITHIN A 1/4 MILE RADIUS OF SITE

1. WELL	2. DEPTH (specify unit)	3. LOCATION (proximity to population/buildings)	4. NON-COM- MUNITY (mark 'X')	5. COMMUN- ITY (mark 'X')
UNKNOWN				

I. RECEIVING WATER

1. NAME

Hudson River

☒ 2. SEWERS☐ 3. STREAMS/RIVERS☐ 4. LAKES/RESERVOIRS☐ 5. OTHER (specify):

6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS

Hudson River (INDUSTRIAL
RECREATIONAL)

XI. SOIL AND VEGETATION DATA

LOCATION OF SITE IS IN:

☐ A. KNOWN FAULT ZONE☐ B. KARST ZONE☐ C. 100 YEAR FLOOD PLAIN☐ D. WETLAND☐ E. A REGULATED FLOODWAY☐ F. CRITICAL HABITAT☐ G. RECHARGE ZONE OR SOLE SOURCE AQUIFER

XII. TYPE OF GEOLOGICAL MATERIAL OBSERVED

Mark 'X' to indicate the type(s) of geological material observed and specify where necessary, the component parts.

'X'	A. COVERED	'X'	B. BEDROCK (specify below)	'X'	C. OTHER (specify below)
<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			
	1. SAND				
	2. CLAY	<input checked="" type="checkbox"/>			
	3. GRAVEL	<input checked="" type="checkbox"/>			

XIII. SOIL PERMEABILITY

☒ A. UNKNOWN☐ B. VERY HIGH (100,000 to 1000 cm/sec.)☐ C. HIGH (1000 to 10 cm/sec.)☐ D. MODERATE (10 to .1 cm/sec.)☐ E. LOW (.1 to .001 cm/sec.)☐ F. VERY LOW (.001 to .00001 cm/sec.)

G. RECHARGE AREA

☐ 1. YES☒ 2. NO

3. COMMENTS:

H. DISCHARGE AREA

☐ 1. YES☒ 2. NO

3. COMMENTS:

I. SLOPE

1. ESTIMATE % OF SLOPE

60-80%

2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC.

J. OTHER GEOLOGICAL DATA

The site is an open portion of land / THAT
 HAS NEVER BEEN DEVELOPED. IT IS SUSPECTED TO
 CONTAIN PRIMARILY FILL WITH, Rocks/Boulders / Sand Gravel

XIV. PERMIT INFORMATION

List all applicable permits held by the site and provide the related information. *2/17*

A. PERMIT TYPE (e.g., RCRA, State, NPDES, etc.)	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo., day, & yr.)	E. EXPIRATION DATE (mo., day, & yr.)	F. IN COMPLIANCE (mark 'X')		
					1. YES	2. NO	3. UN- KNOWN

XV. PAST REGULATORY OR ENFORCEMENT ACTIONS

☒ NONE ☐ YES (summarize in this space)

NOTE: Based on the information in Sections III through XV, fill out the Tentative Disposition (Section II) information on the first page of this form.



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

Michele M. Putnam
Deputy Director

John J. Trella, Ph.D., Director
401 East State St.

CN 028

Trenton, N.J. 08625-0028
(609)633-1408

Lance R. Miller
Deputy Director

Hazardous Waste Operations

Responsible Party Remedial Action

FEB 23 1989

Stephen Luftig, Director
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Dear Director Luftig:

Re: Removal Request - Ideal Cooperage
New York Avenue
Jersey City, New Jersey

The New Jersey Department of Environmental Protection hereby submits the Ideal Cooperage site for CERCLA removal action consideration. The following information details the case history and supports the removal request.

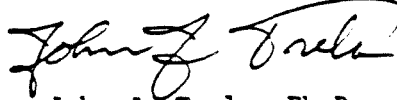
The Ideal Cooperage site is a former drum reconditioning facility located on three acres in the northeast corner of Jersey City, Hudson County. The site is divided by a sharp geological gradient into a lower half (Block 712, Lot 11A), now owned by a trucking company, and an upper half (Block 712, Lot 10A), an undeveloped section used for drum storage where 500-700 drums remain.

Although most drums on the upper half are empty, a number contain unknown liquid or solid materials. Some drums are leaking or unsecured. The site is accessible to the public and is regularly used for dumping of garbage and as a short-cut for pedestrians. Local children are known to play at the site and have built a "fort" out of empty drums. Thus there is a high potential for exposure to these unknown substances.

The current principals of Ideal Cooperage are Marie Monck, widow of the former owner, George Monck, and Oreste J. Pascale who served as the company vice president. The NJDEP is currently preparing a Directive to be issued in early February and is also conducting an investigation to identify additional responsible parties.

This site has received preliminary approval of the USEPA Response and Prevention Branch in Edison; please advise me of your final determination. Should your staff require additional information, please have them contact Ken Kloo of the Bureau of Planning and Assessment at (609) 633-2219. Thank you again for your continued cooperation.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John J. Trela".

John J. Trela, Ph.D.
Director

KK:mz

c: Richard Salkie, USEPA

TAT-02-F-06211

PROJECT SAMPLING PLAN II
IDEAL COOPERAGE SITE
JERSEY CITY, HUDSON COUNTY, NEW JERSEY

FEBRUARY 1991

Prepared by:

Peter Di Pasca, Jr.
Roy F. Weston, Inc.
Major Programs Division
Technical Assistance Team
Edison, New Jersey

For:

J. Daniel Harkay
United States Environmental Protection Agency
Removal Action Branch
Edison, New Jersey

PROJECT SAMPLING PLAN II
IDEAL COOPERAGE SITE

1. PROJECT NAME: Ideal Cooperage Site
3-25 New York Avenue
Jersey City, Hudson County, New Jersey
2. PROJECT REQUESTED BY: J. Daniel Harkay, On-Scene
Coordinator (OSC), Response and
Prevention Branch, USEPA
3. DATE REQUESTED: October, 1989
4. DATE OF PROJECT INITIATION: March, 1991
5. PROJECT OFFICER: Peter Di Pasca, Jr., TAT Region II
6. QUALITY ASSURANCE OFFICER: Edward Twilley, ERCS Region II
7. PROJECT DESCRIPTION:


A. SITE BACKGROUND

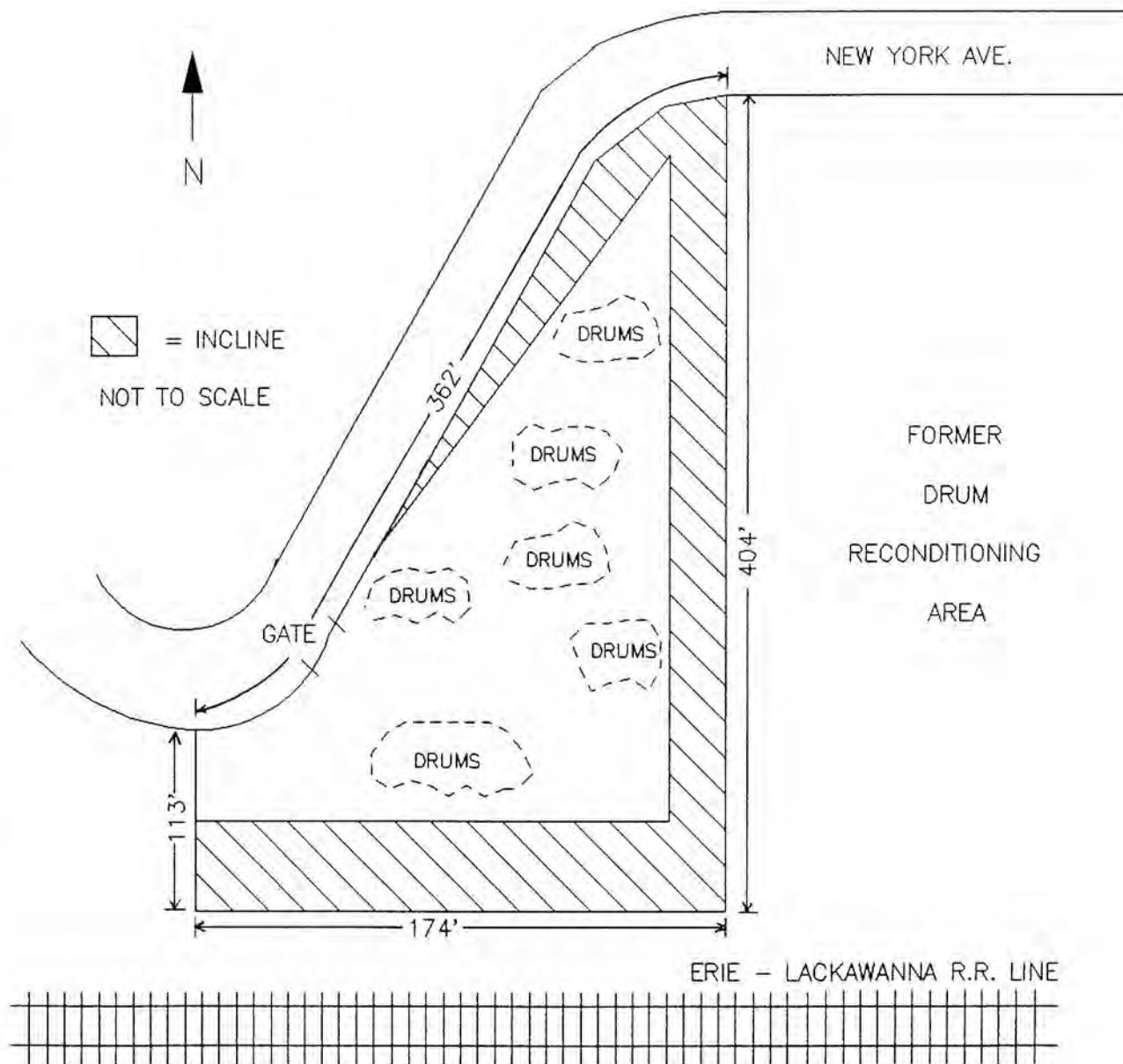
The Ideal Cooperage site is located at 3-25 New York Avenue in Jersey City, Hudson County, New Jersey. Figure 1 provides a site location map. The approximately 2-acre site is situated in an industrial section of the city. The site is bounded on the north and west by New York Avenue, on the south by the Erie-Lackawanna Rail Line and on the east by a developed lot. The property is relatively flat and elevated, with the northern, eastern and southern perimeters sloping downward toward the property line. Figure 2 provides a site map. The ground consists of loose soil with low brush and some small trees.

During the 1970s, Ideal Cooperage, Inc. used the site as part of their drum reconditioning operations. Although the actual rinsing and reconditioning of the drums were performed on an adjacent lot, empty drums were stored on this site. In the fall of 1981, Ideal Cooperage ceased operations and abandoned both properties. The property on which the processing took place was eventually sold and redeveloped; however, the lot which was used for storage still remains abandoned.

Assessments performed by the New Jersey Department of Environmental Protection (NJDEP) and, more recently, by the USEPA Technical Assistance Team (TAT) have determined that approximately 600 drums remain on-site. Most of these drums are empty, but about 10% contain material. Since many of the drums containing liquid are upright and missing bungs, the liquid may be rainwater. A majority of the empty drums are severely deteriorated and appear to have been on the property for several years. A subsurface soil investigation conducted



 <p style="text-align: center;">Roy F. Weston, Inc. MAJOR PROGRAMS DIVISION</p>	<p>EPA PM D. HARKAY</p>	<p>FIGURE 1 LOCATION MAP</p>
<p>IN ASSOCIATION WITH FOSTER WHEELER CORP., C.C JOHNSON & MALHOTRA, P.C., RESOURCE APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES</p>	<p>TAT PM P. DI PASCA</p>	<p>IDEAL COOPERAGE JERSEY CITY, NJ</p>



Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

IN ASSOCIATION WITH FOSTER WHEELER CORP.,
C.C. JOHNSON & MALHOTRA, P.C., RESOURCE
APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

EPA PM

D. HARKAY

FIGURE 2
SITE MAP

TAT PM

P. DI PASCA

IDEAL COOPERAGE
JERSEY CITY, NJ

several years ago by a private consultant detected low levels of toluene, perchloroethylene, and petroleum hydrocarbons. In addition, buried drums may be present on the site.

The site had been used in recent years as an illegal dumping ground for household garbage, construction debris, and abandoned automobiles. Seventeen rolloff containers of solid waste were once cleared from the site, but lack of security made it impossible to keep the property free of trash. In April 1989, the Jersey City Department of Engineering performed renovations on the section of New York Avenue bordering the site. Included in these renovations were the installation of sidewalks, guard rails, and a chain-link fence along the northern and western borders of the site. Although these improvements have prevented the dumping of trash and debris onto the site, the property is still frequented by trespassers. Neighborhood children have also used the site as a playground, and had even built a "fort" using empty drums.

B. OBJECTIVE

The purpose of the sampling program is to determine the types of hazardous substances present on the parcel of land formerly occupied by Ideal Cooperage, Inc. The field program will include collection of samples from drummed materials, installation of test pits, and collection of surface and subsurface soil samples. The sampling activities will be performed by the Technical Assistance Team (TAT) under the supervision of the EPA OSC. Samples will be field-screened and/or sent for laboratory analysis. The results of the analyses will be used to establish the presence of hazardous materials and to determine the proper methods of disposal.

C. SCOPE OF WORK

1. Drum Sampling

Drums will be staged and segregated on-site according to the solid and liquid characteristics of the drummed material. Recent field observations and on-site testing of drum samples have tentatively identified the contents of several drums. Most of the solid material appears to be a waxy, organic substance, while the majority of the liquids are aqueous. Other drums which were field-tested are believed to contain acetic acid and surfactants. It is estimated that 25-30 drums contain solid material, and 25-30 drums contain liquid material.

One (1) sample per drum will be collected and field-screened to determine waste classifications. Field tests will include water and hexane solubilities, pH, ignitibility and oxidizer tests, and HNu-PID screening. After all drums have been

screened and characterized, composite samples will be developed to verify compatibility. Compatible material will then be bulked, sampled, and sent to an EPA-certified laboratory for analysis. At the completion of the sampling, the drums will be covered with plastic sheeting and secured to prevent rainwater infiltration and vandalism.

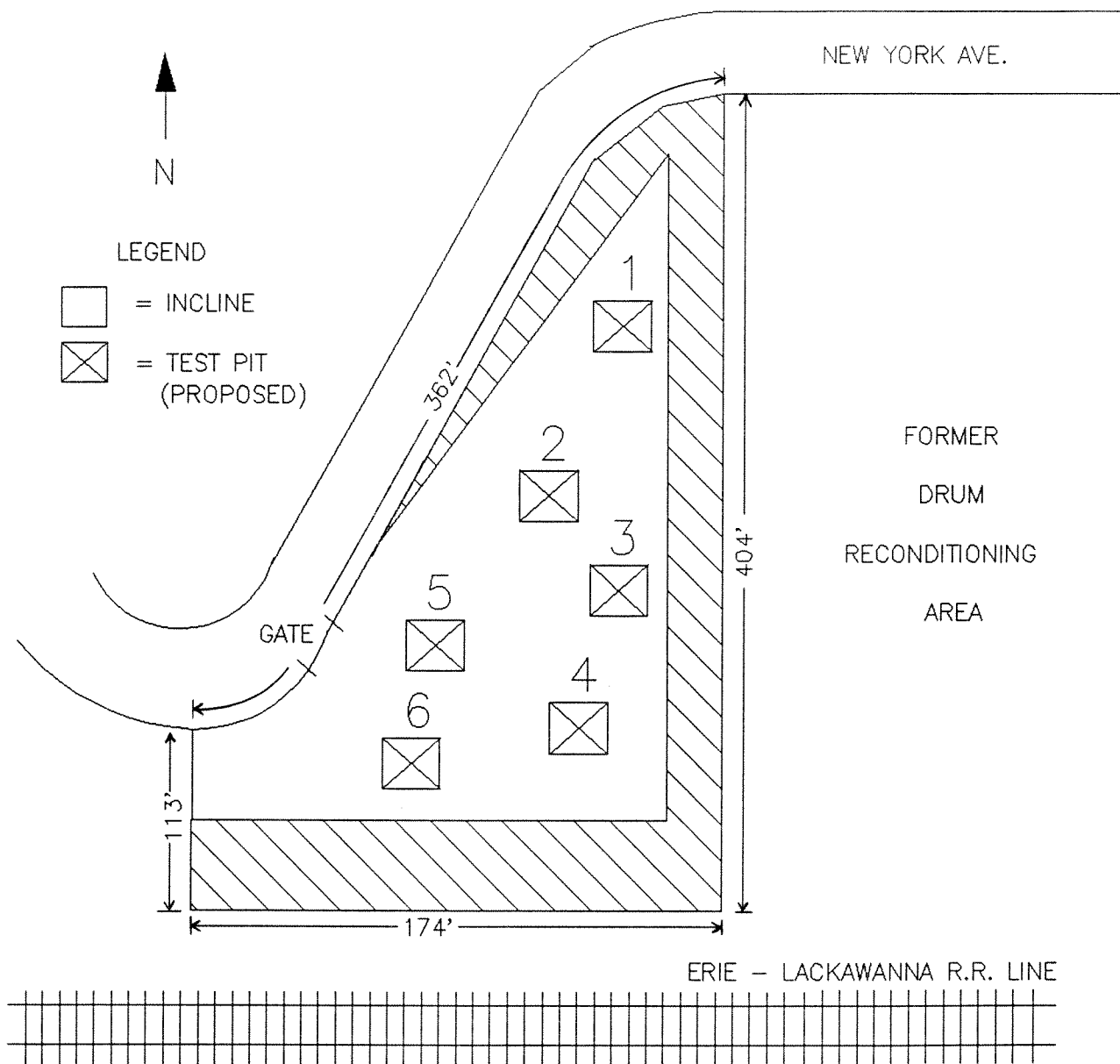
2. Test Pit Investigation

To determine if drums are buried on the site, a total of six (6) test pits will be excavated. The approximate locations of the test pits are shown on Figure 3. Actual test pit locations will be determined in the field, based on field observations and topographic conditions. The test pits will be excavated to a depth of 16 feet below the surface. If drums or immovable objects are encountered during the test pit excavation, soil removal will stop, and the excavation will be backfilled. A second test pit will be attempted adjacent to the original excavation. As the test pits are excavated, the subsurface soil will be field-scanned with a photoionization detector (HNU-PID) to determine the presence of volatile organic compounds.

One (1) soil sample will be collected from each test pit location prior to excavation at a depth of 0-0.5 feet. Additional soil samples will be collected from the test pits at depth if contaminated soil or buried drums are encountered, or if HNU readings indicate the presence of volatile organic compounds. Following completion of the subsurface investigation, the test pits will be backfilled. All soil samples will be sent directly to a laboratory for analysis.

3. Sample Analysis

Drum samples will be analyzed for disposal characteristics which include Target Compound List (TCL) and Toxicity Characteristic Leachate Procedure (TCLP) parameters. Soil samples will be analyzed for TCL parameters. The proposed analytical parameters are summarized in Table 1. All sample collection activities will be conducted in accordance with the sampling and quality assurance/quality control (QA/QC) procedures presented in Sections 10 through 13 of this report.



Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

IN ASSOCIATION WITH FOSTER WHEELER CORP.,
 C.C JOHNSON & MALHOTRA, P.C., RESOURCE
 APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

EPA PM
 D. HARKAY

TAT PM
 P. DI PASCA

FIGURE 3
 TEST PIT
 LOCATION MAP

IDEAL COOPERAGE
 JERSEY CITY, NJ

TABLE 1 - ANALYTICAL PARAMETERS

<u>Parameter</u>	<u># Of Samples</u>	<u>Sample Matrix*</u>	<u>Analytical Method**</u>	<u>Sample Preservation</u>	<u>Holding Time</u>	<u>Volume</u>
Volatiles	6-18	Soil	8240	None	10 Days	2 x 120 ml
Extractables: BNAs	6-18	Soil	8250	None	Extract 10 Days	8 oz
PCB/Pesticides	6-18	Soil	8080	None	Extract 10 Days	Incl. w/ BNA
Total Metals	6-18	Soil	7000	None	6 Months	8 oz
Volatiles	1-2	Aqueous	624	Cool to 4°C HCl to pH < 2	10 Days	2 x 40 ml Vial
Extractables: BNAs	1-2	Aqueous	625	Cool to 4°C	Extract 5 Days	4 x 1 L Amber Glass
PCBs/Pesticides	1-2	Aqueous	608	Cool to 4°C	Extract 5 Days	Incl. w/ BNA
Total Metals	1-2	Aqueous	200	Cool to 4°C HNO ₃ to pH < 2	6 Months	1 L Poly
TCLP	1-2	Aqueous	1311	Cool to 4°C	Extract 14 Days	2 x 1 L Amber Glass
Volatiles	1-3	Solid	8240	None	10 Days	8 oz
Extractables: BNAs	1-3	Solid	8250	None	Extract 10 Days	Incl. w/ VOA
PCBs/Pesticides	1-3	Solid	8080	None	Extract 10 Days	Incl. w/ VOA
Total Metals	1-3	Solid	7000	None	6 Months	8 oz
TCLP	1-3	Solid	1311	None	Extract 14 Days	2 x 8 oz
Volatiles	1-3	Liquid	8240	None	10 Days	8 oz
Extractables: BNAs	1-3	Liquid	8250	None	Extract 10 Days	Incl. w/ VOA
PCBs/Pesticides	1-3	Liquid	8080	None	Extract 10 Days	Incl. w/ VOA
Total Metals	1-3	Liquid	7000	None	6 Months	8 oz
TCLP	1-3	Liquid	1311	None	Extract 14 Days	2 x 8 oz

Note: * = Soil and Aqueous Samples: Low Concentration
 Minimum Detection Level: 5 ppb
 Solid and Liquid Samples: High Concentration
 Minimum Detection Level: 1 ppm

 ** = 3-Digit Methods: MCAWW
 4-Digit Methods: SW-846

8. PROJECT FISCAL INFORMATION:

Sampling equipment and manpower will be provided by the Technical Assistance Team (TAT) contractor in coordination with the USEPA. All man-hours expended by TAT will be charged to Technical Direction Document (TDD) # 02-9010-0065. Drum handling and test pit excavation equipment will be provided by the Emergency Response Cleanup Services (ERCS) contractor in coordination with the USEPA. All man-hours and costs expended by ERCS will be charged to Delivery Order (DO) # 0102-02-016. Laboratory analysis will be also be arranged and paid for by the ERCS contractor.

9. PROJECT ORGANIZATIONS AND RESPONSIBILITY:

The following is a list of key project personnel and their corresponding responsibilities:

J. Daniel Harkay, USEPA	Project Director / OSC
Joseph Rotola, USEPA	Alternate OSC
Edward Twilley, ERCS	Drum Segregation and Bulking Test Pit Investigation Laboratory Coordination Analytical Data QA/QC
Peter Di Pasca, TAT	Drum and Soil Sampling Sample Field Screening Test Bulking

10. SAMPLING PROCEDURE:

The sampling procedures for each area are as follows:

A. Soil Sampling

Surface samples will be collected with stainless steel trowels. Subsurface samples will be collected directly from the backhoe bucket using stainless steel trowels. No personnel will enter an excavation. The following decontamination procedure will be followed after collection of each sample:

- a. Wash and scrub with soap and water;
- b. Tap water rinse;
- c. Rinse with 10% HNO₃;
- d. Tap water rinse;
- e. A methanol followed by hexane or acetone rinse;

- f. Deionized water rinse;
- g. Air dry.

If disposable plastic scoops are used in place of stainless steel trowels, the scoops will only be used once and discarded with personal protective equipment (PPE).

B. Drum Sampling

All closed drums will be carefully opened with non-sparking tools. Liquid samples will be extracted with disposable glass drum thieves. After each drum thief is used, the glass tube will be removed from the drum for subsequent disposal with a solid hazardous waste stream. Solid samples will be taken with disposable plastic scoops or stainless steel trowels. If a thief or a scoop cannot be used, an appropriate alternative method will be used which will not affect the integrity of the collected sample.

NOTE: If more than one liquid phase is observed in the glass tube during liquid drum sampling, samples of each phase will be collected using the same method and placed in separate sample containers for analysis.

Sample containers have been specialty-cleaned by I-Chem Research, Inc. Collected samples will be individually labelled in the field, placed in ziplock plastic bags, and stored in coolers (with ice packs if necessary) until delivery to the laboratory. The field team will also be responsible for preparation of the proper Chain-of-Custody form before transferring the samples to the laboratory. All samples will either be shipped to the laboratory by TAT or mailed via Federal Express following the proper DOT regulations. This will include the use of coolers, paint cans, and vermiculite.

These sampling procedures will be adhered to where practical, but may need to be modified based upon field evaluations. Any deviations from the above methods will be noted in the final report.

11. SAMPLE CUSTODY PROCEDURES:

EPA Chain-of-Custody will be maintained throughout the sampling program as per TAT Standard Operating Procedures (SOP) on sample handling, sample container contract specifications and EPA Laboratories SOP. The Chain-of-Custody form to be used lists the following information:

- i. Sample number;
- ii. Number of sample containers;

- iii. Description of samples including specific location of sample collection;
- iv. Identity of person collecting the sample;
- v. Date and time of sample collection;
- vi. Date and time of custody transfer to laboratory (if the sample was collected by a person other than laboratory personnel);
- vii. Identity of person accepting custody (if the sample was collected by a person other than the laboratory personnel);
- viii. Identity of laboratory performing the analysis.

12. DOCUMENTATION, DATA REDUCTION AND REPORTING:

Field data will be entered into a bound notebook. Field notebooks, field data sheets, Chain-of-Custody forms, and laboratory analysis reports will be filed and stored per the TAT Document Control System.

13. QUALITY ASSURANCE AND DATA REPORTING:

The level of quality assurance to be furnished by the contracted laboratory will be equivalent to QA-2 and will, at a minimum, consist of the following measures to ensure accurate data:

- 1. One field blank consisting of organic-free water will be shipped to the laboratory. This blank is to be analyzed to ensure that field contamination has not occurred.
- 2. A trip blank will be supplied for volatile organic analysis to verify that samples had not been contaminated during shipment.
- 3. One blind duplicate for every 20 samples of each matrix will be submitted to determine analytical precision. Results will be documented and submitted in the written report.
- 4. Matrix spike and matrix spike duplicate analysis will also be performed on one sample for every 20 samples of each matrix. Triple volume will be collected.
- 5. The contracted laboratory will also furnish the following deliverables as warranted:

- a) GC/MS tuning and calibration standards;
- b) Copies of all spectral data obtained during performance of analysis. Copies should be signed by the analyst and checked by the Laboratory Manager;
- c) Data system printout (quantitation report or legible facsimile (GC/MS));
- d) Manual work sheets;
- e) Identification and explanation of any analytical modifications used that differ from USEPA protocol.

All results are to be completed and a verbal and/or written report submitted by the laboratory to the ERCS Analytical Data QA/QC officer. Turnaround times for verbal and written reports are to be arranged by ERCS and the contracted laboratory.

14. DATA VALIDATION:

All steps of data generation and handling will be evaluated by the Project Officer and the Quality Assurance Officer for compliance with the specified requirements.

15. SYSTEM AUDIT:

The QA/QC Officer will observe the sampling operations and review the subsequent analytical data to assure that the QA/QC project plan has been followed.

16. CORRECTIVE ACTION:

All provisions will be taken in the field and laboratory to ensure that any problems that may develop will be dealt with as quickly as possible to ensure the continuity of the sampling program. Any deviations from this sampling plan will be noted in the final report.

17. REPORTS:

Laboratory results and all requested QA/QC information will be submitted to EPA upon completion of sample analyses. Sampling reports will be issued after receipt of laboratory results.

RESULTS FROM FIELD TESTING OF DRUMS AT IDEAL COOPERAGE SITE, NOVEMBER 10, 1989

SAMPLE #	SAMPLE STATE	HNU READING	WATER SOLUBILITY	HEXANE SOLUBILITY	SPECIFIC GRAVITY	PH	FLAMMABILITY TEST
T-1	LIQUID, CLEAR	0	100 %	0 %	1.000	6-7	FAILS
T-2	LIQUID, RUSTY	0	100 %	0 %	1.000	6-7	FAILS
T-3	LIQUID, RUSTY	0	100 %	0 %	1.000	6-7	FAILS
T-4	SOLID, BLACK	0	0 %	100 %	N/A	5-6	MELTS
T-5	LIQUID, SOAPY	0	100 %	0 %	NOT DONE	8	FAILS
T-6	SOLID, BLACK	0	0 %	100 %	N/A	6	MELTS
T-7	SOLID, BLACK	0	0 %	100 %	N/A	5	MELTS
T-8	LIQUID, CLEAR	150	100 %	0 %	NOT DONE	1	FAILS

OBSERVATIONS AND CONCLUSIONS:

SAMPLES T-1, T-2, T-3: DRUMS CONTAIN WATER, PROBABLY RAINWATER

SAMPLES T-4, T-6, T-7: SAMPLES HAD A CRAYON-LIKE ODOR AND WAXY CONSISTENCY AFTER FLAME TEST
DRUMS CONTAIN AN ORGANIC SOLID

SAMPLE T-5: DRUM CONTAINS WATER WITH SURFACTANT

SAMPLE T-8: SAMPLE HAD A VINEGAR ODOR; DRUM CONTAINS ACETIC ACID

SAMPLING RESULTS SUMMARY FOR DRUMMED SOLID MATERIAL
IDEAL COOPERAGE SITE
JERSEY CITY, HUDSON COUNTY, NEW JERSEY

	LAB BLANK (UG/L)	FIELD BLANK (UG/L)	SAMP 001 DRUM MAT (UG/KG)	SAMP 002 DRUM MAT (UG/KG)
VOLATILES ORGANICS				
METHYL CHLORIDE	ND	ND	ND	ND
METHYL BROMIDE	ND	ND	ND	ND
VINYL CHLORIDE	ND	ND	ND	ND
CHLOROETHANE	ND	ND	ND	ND
METHYLENE CHLORIDE	ND	ND	ND *	ND *
ACETONE	ND	ND	ND	ND
CARBON DISULFIDE	ND	ND	ND	ND
1,1-DICHLOROETHYLENE	ND	ND	ND *	ND *
1,1-DICHLOROETHANE	ND	ND	ND *	ND *
1,2-TRANS DICHLOROETHYLENE	ND	ND	ND *	ND *
CHLOROFORM	ND	ND	ND *	ND *
1,2-DICHLOROETHANE	ND	ND	ND *	ND *
2-BUTANONE	ND	ND	ND	ND
1,1,1-TRICHLOROETHANE	ND	ND	ND *	ND *
CARBON TETRACHLORIDE	ND	ND	ND *	ND *
VINYL ACETATE	ND	ND	ND	ND
DICHLOROBROMOMETHANE	ND	ND	ND *	ND *
1,2-DICHLOROPROPANE	ND	ND	ND *	ND *
1,3-DICHLOROPROPYLENE	ND	ND	ND	ND
TRICHLOROETHYLENE	ND	ND	ND *	ND *
CHLORODIBROMOMETHANE	ND	ND	ND *	ND *
1,1,2-TRICHLOROETHANE	ND	ND	ND *	ND *
BENZENE	0.06 M	ND	ND *	ND *
CIS-1,3-DICHLOROPROPENE	ND	X	ND	ND
BROMOFORM	ND	ND	ND *	ND *
4-METHYL-2-PENTANONE	ND	ND	ND	ND
TETRACHLOROETHYLENE	ND	ND	ND *	ND *
1,1,2,2-TETRACHLOROETHANE	ND	ND	ND *	ND *
2-HEXANONE	ND	ND	28000	24000
TOLUENE	ND	ND	ND *	ND *
CHLOROBENZENE	ND	ND	ND *	ND *
ETHYLBENZENE	ND	ND	ND *	ND *
STYRENE	ND	X	ND	ND
XYLENES (TOTAL)	ND	X	ND	ND

TENTATIVELY IDENTIFIED COMPOUNDS

6-METHYL-2-HEPTANONE	X	X	18000 J	21000 J
2-NONANONE	X	X	1400000 J	X
2-HEPTANONE	X	X	450000 J	440000 J

	LAB BLANK (UG/L)	FIELD BLANK (UG/L)	SAMP 001 DRUM MAT (UG/KG)	SAMP 002 DRUM MAT (UG/KG)
BASE NEUTRALS				
2-CHLOROPHENOL	ND	ND	ND *	ND *
2-NITROPHENOL	ND	ND	ND *	ND *
PHENOL	ND	ND	ND *	6500 M
2,4-DIMETHYLPHENOL	ND	ND	ND *	ND *
2,4-DICHLOROPHENOL	ND	ND	ND *	ND *
2,4,6-TRICHLOROPHENOL	ND	ND	ND *	4000 M
P-CHLORO-M-CRESOL	ND	ND	ND *	13000 M
2,4-DINITROPHENOL	ND	ND	ND	ND
4,6-DINITRO-O-CRESOL	ND	ND	ND *	ND *
PENTACHLOROPHENOL	ND	ND	13000 M	62000 M
4-NITROPHENOL	ND	ND	ND	ND
1,3-DICHLOROBENZENE	ND	ND	ND *	ND *
1,4-DICHLOROBENZENE	ND	ND	ND *	ND *
1,2-DICHLOROBENZENE	ND	ND	ND *	ND *
HEXACHLOROETHANE	ND	ND	ND *	ND *
HEXACHLOROBUTADIENE	ND	ND	ND *	ND *
1,2,4-TRICHLOROBENZENE	ND	ND	ND *	ND *
NAPHTHALENE	ND	ND	ND *	ND *
BIS(2-CHLOROETHYL) ET.	ND	ND	ND *	ND *
BIS(2-CHLOROETHOXY) METH.	ND	ND	ND *	ND *
ISOPHORONE	ND	ND	ND *	ND *
NITROBENZENE	ND	ND	ND *	ND *
N-NITROSODI-N-PROPYLAMINE	ND	ND	ND *	ND *
N-NITROSODIPHENYLAMINE	ND	ND	ND *	ND *
BIS(2-CHLOROISOPROPYL) ET.	ND	ND	ND *	ND *
HEXACHLOROCYCLOPENTADIENE	ND	ND	ND *	ND *
2-CHLORONAPHTHALENE	ND	ND	ND *	ND *
ACENAPHTHYLENE	ND	ND	ND *	ND *
ACENAPHTHENE	ND	ND	ND *	ND *
FLUORENE	ND	ND	ND *	ND *
HEXACHLOROBENZENE	ND	ND	ND *	ND *
4-BROMOPHENYL PHENYL ET.	ND	ND	ND *	ND *
PHENATHRENE	ND	ND	ND *	ND *
ANTHRACENE	ND	ND	ND *	ND *
DIMETHYL PHTHALATE	ND	ND	ND *	ND *
DIETHYL PHTHALATE	0.2 M	ND	ND *	ND *
DI-N-BUTYLPHTHALATE	0.6 M	ND	ND *	ND *
BUTYL BENZYL PHTHALATE	ND	ND	ND *	4800 M
DI-N-OCTYL PHTHALATE	ND	ND	ND *	ND *
BIS(2-ETHYLHEXYL) PHTHAL.	0.9 M	ND	ND *	ND *
FLUORANTHENE	ND	ND	ND *	ND *
PYRENE	ND	ND	ND *	ND *
CHRYSENE	ND	ND	ND *	8000 M
1,2-BENZANTHRACENE	ND	ND	ND *	6500 M
4-CHLOROPHENYL PHENYL ET.	ND	ND	ND *	ND *
INDENO(1,2,3-C,D) PYRENE	ND	ND	ND *	ND *
BENZO(A) PYRENE	ND	ND	ND *	ND *
1,12-BENZOPERYLENE	ND	ND	ND *	ND *
1,2:5,6-DIBENZANTHRACENE	ND	ND	ND *	ND *
3,3'-DICHLOROBENZIDENE	ND	ND	ND *	ND *

	LAB	FIELD	SAMP 001	SAMP 002
	BLANK	BLANK	DRUM MAT	DRUM MAT
	(UG/L)	(UG/L)	(UG/KG)	(UG/KG)

BASE NEUTRALS (CONTINUED)

2,6-DINITROTOLUENE	ND	ND	ND *	ND *
2,4-DINITROTOLUENE	ND	ND	ND *	ND *
1,2-DIPHENYLHYDRAZINE	ND	ND	ND *	ND *
3,4-BENZOFUORANTHENE	ND	ND	ND	ND
11,12-BENZOFUORANTHENE	ND	ND	ND	ND
BENZYL ALCOHOL	ND	ND	ND *	ND *
2-METHYL PHENOL	ND	ND	ND *	ND *
4-METHYL PHENOL	ND	ND	4000 M	4600 M
BENZOIC ACID	ND	ND	ND *	ND *
4-CHLOROANILINE	ND	ND	ND *	ND *
2-METHYL NAPHTHALENE	ND	ND	ND *	ND *
2,4,5-TRICHLOROPHENOL	ND	ND	ND *	ND *
2-NITROANILINE	ND	ND	ND *	ND *
3-NITROANILINE	ND	ND	ND *	ND *
DIBENZOFURAN	ND	ND	ND *	ND *
4-NITROANILINE	ND	ND	ND *	ND *
ANILINE	X	ND	ND *	ND *

	LAB	FIELD	SAMP 001	SAMP 002
	BLANK	BLANK	DRUM MAT	DRUM MAT
	(UG/L)	(UG/L)	(UG/KG)	(UG/KG)

PESTICIDES AND PCBs

ALDRIN	ND	ND	ND	ND
DIELDRIN	ND	ND	ND	ND
CHLORDANE	ND	ND	ND	ND
ALPHA CHLORDANE	ND	ND	ND	ND
BETA CHLORDANE	ND	ND	ND	ND
GAMMA CHLORDANE	ND	ND	ND	ND
4,4'-DDT	ND	ND	ND	ND
4,4'-DDE	ND	ND	ND	ND
4,4'-DDD	ND	ND	ND	ND
ALPHA ENDOSULFAN	ND	ND	ND	ND
BETA ENDOSULFAN	ND	ND	ND	ND
ENDOSULFAN SULFATE	ND	ND	ND	ND
ENDRIN	ND	ND	ND	ND
ENDRIN ALDEHYDE	ND	ND	ND	ND
ENDRIN KETONE	ND	ND	ND	ND
HEPTACHLOR	ND	ND	ND	ND
HEPTACHLOR EPOXIDE	ND	ND	ND	ND
ALPHA-BHC	ND	ND	ND	ND
BETA-BHC	ND	ND	ND	ND
GAMMA-BHC	ND	ND	ND	ND
DELTA-BHC	ND	ND	ND	ND
METHOXYCHLOR	ND	ND	ND	ND
TOXAPHENE	ND	ND	ND	ND
PCB-1016	ND	ND	ND	ND
PCB-1221	ND	ND	ND	ND
PCB-1232	ND	ND	ND	ND
PCB-1242	ND	ND	ND	ND
PCB-1248	ND	ND	ND	ND
PCB-1254	ND	ND	ND	ND
PCB-1260	ND	ND	ND	ND

	LAB BLANK (UG/L)	FIELD BLANK (MG/L)	SAMP 001 DRUM MAT (MG/KG)	SAMP 002 DRUM MAT (MG/KG)
TOTAL METALS AND CYANIDES				
SILVER	X	ND	ND	ND
ALUMINUM	X	0.081 M	256.0	190.0
ARSENIC	X	ND	ND	0.5 M
BARIUM	X	ND	8.00	8.13
BERYLLIUM	X	ND	ND	ND
CALCIUM	X	0.2 M	3080	3470
CADMIUM	X	ND	ND	ND
COBALT	X	ND	7.77	7.83
CHROMIUM	X	ND	14.0	13.3
COPPER	X	ND	32.6	38.6
IRON	X	ND	4599	5678
MERCURY	X	ND	ND	ND
POTASSIUM	X	32.3 J	123.9 J	97.2 J
MAGNESIUM	X	0.2	170.0	166.0
MANGANESE	X	ND	62.3	65.9
SODIUM	X	0.34 J	2416 J	2356 J
NICKEL	X	ND	957	955
LEAD	X	ND	30.8	27.8
ANTIMONY	X	ND	ND	ND
SELENIUM	X	ND	ND	ND
THALLIUM	X	ND	ND	ND
VANADIUM	X	ND	1.37	1.25
ZINC	X	ND	81.1	78.6
CYANIDES	X	X	ND	ND

KEY:

- J : INDICATES AN ESTIMATED VALUE.
- M : INDICATES PRESENCE OF MATERIAL VERIFIED, BUT NOT QUANTIFIED.
- ND : INDICATES COMPOUND WAS ANALYZED FOR BUT NOT DETECTED.
- ND * : INDICATES COMPOUND WAS ANALYZED FOR BUT NOT DETECTED AT ELEVATED DETECTION LIMITS.
- X : INDICATES COMPOUND WAS NOT ANALYZED.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

DATE:

SEP 13 1990

SUBJECT:

Removal Site Evaluation and Funding Authorization for a CERCLA
Removal Action at the Ideal Cooperage Site, Jersey City, Hudson
County, New Jersey - **ACTION MEMORANDUM**

FROM:

Richard Salkie
Dan Harkay, On-Scene Coordinator
Removal Action Branch

TO:

Richard L. Caspe, P.E. Director
Emergency and Remedial Response Division

Richard Salkie
THRU: Richard Salkie, Associate Director for
Removal and Emergency Preparedness Programs

I. EXECUTIVE SUMMARY

This memorandum details the removal site evaluation of the Ideal Cooperage property and requests funding for a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) removal action at the site. The funding request will provide for sampling/analysis/disposal of solid and liquid drummed wastes and initiation of a surface and subsurface investigation to determine the extent of buried drums and contaminated soil present on the site. The funds will also support enforcement and cost recovery actions against the potentially responsible parties (PRP).

The Ideal Cooperage site was referred by the New Jersey Department of Environmental Protection (NJDEP) to the Removal Action Branch (RAB) of the United States Environmental Protection Agency (EPA) on February 3, 1989. Preliminary investigations conducted at the site began in the spring of 1989 and were completed in the fall of 1989. The total estimated cost for completing the activities outlined in this Action Memorandum is \$246,000 of which \$180,000 is for mitigation contracting.

Ideal Cooperage was engaged in reconditioning of industrial drums at their Jersey City facility from 1952 until 1981. In 1981, operations ceased and the facility filed for bankruptcy.

Site investigations conducted by the EPA, identified approximately 700 drums on the site. The drums are concentrated in six (6) areas, however, numerous drums are strewn throughout the site. Although, some drums have been observed to be empty, drums containing liquid and solid material were also noted and are in an advanced state of deterioration.

Laboratory analysis of samples collected by EPA, identified hazardous substances in the drums containing solids. Liquid, in one (1) drum was determined to be an acid, with a pH of less than two (2).

The conditions at the site pose a threat to public health and welfare as defined under Section 300.415(b)(2) of the National Contingency Plan (NCP). The nature of the hazardous materials on-site, (phenols, cresols, acids) present a threat of direct contact to area residents. Surface contamination, with hazardous materials, may result from spillage, due to the deteriorated condition of the drums. These factors represent a threat to public health, welfare and the environment.

II. BACKGROUND

A. Site Description

The Ideal Cooperage site is located on New York Avenue in the Town of Jersey City, New Jersey. A site location map is included as figure 1. The former three (3) acre site, was comprised of two (2) parcels of land (lot 10A and lot 11A). The parcels are situated at two (2) different elevations, separated by a 50 to 90 foot cliff. Facility buildings and drum reconditioning operations were located on the lower parcel (lot 11A). The upper parcel (lot 10A) was utilized for empty drum storage and is the subject of this Action Memorandum.

Following the sale of the lower parcel, the area was developed and is presently operated as a truck terminal. The upper parcel is undeveloped and overgrown with heavy vegetation.

Commercial and industrial zoned properties are located adjacent to the site. The nearest residential area is located approximately 1,000 feet to the west and northwest of the site. Except for the south boundary of the property, which is parallel to the Erie Lackawanna Railroad, the site is totally enclosed within a chain-link fence. A site map is included as figure 2.

B. History

Ideal Cooperage operated at the Jersey City site for approximately 28 years, beginning in 1952. In 1964, Ideal Cooperage purchased the property it had leased, from the New York Central Railroad Company. The site included a two (2) lot parcel, situated on a tiered portion of land. Lot 10A is located at an elevation of 50 to 90 feet above lot 11A.

Facility operations, included washing and reconditioning used steel drums, for the chemical industry. Drum reconditioning activities were conducted on the lower parcel of the property.

The upper parcel of property was utilized for empty drum storage. Site operations continued until 1981, when the facility filed for bankruptcy.

a. Lot 11A

In 1982, lot 11A was sold by Ideal Cooperage to Brink Transportation Corporation. Brink demolished all existing structures, regraded the site and constructed new buildings for use as a trucking terminal. The Brink Transportation Corporation property was purchased by 3-25 New York Avenue Corporation in 1987 following bankruptcy proceedings of Brink Transportation Corporation. 3-25 New York Avenue Corporation modified the site in 1989, with the construction of additional facility structures. The facility continues to operate as a truck terminal under the name of Sal-Son Trucking Company. The operational history of lot 11A is addressed, since the parcel was formerly owned by Ideal Cooperage, and has been subject to numerous investigations by NJDEP. An EPA removal action for this parcel is not proposed.

b. Lot 10A

Ideal Cooperage owned lot 10A until 1984 when the property was purchased by the former principals of the Company. The current property owners are Maria Monck, and Richard Pascale.

In 1985, a prospective purchaser of the property retained a private consultant to conduct a subsurface soil investigation on the site. The investigation identified low levels of toluene, tetrachloroethylene and petroleum hydrocarbons.

Following cessation of facility operations, the property was subject to unauthorized dumping of residential and commercial trash and debris.

In 1988, the Jersey City Incineration Authority initiated a cleanup of solid waste in the vicinity of the site in preparation for the proposed reconstruction of New York Avenue. The cleanup program resulted in the removal of 17 roll-off containers of assorted debris.

Reconstruction of New York Avenue began in 1989. The project included widening and resurfacing of the original road, storm sewer and catch basin replacement, installation of the chain-link fence along the road right of way, and regrading portions of the surrounding property. The reconstruction of New York Avenue, and installation of the chain-link fence, resulted in limiting public access to the site via New York Avenue and decreased illegal dumping.

c. Quantity and Types of Substances Present

An assessment of the site was conducted by EPA Removal Action Branch (RAB) and the Technical Assistance Team (TAT) during the month of November 1989. The investigation included collection of samples from drums containing solids and liquids, for field and laboratory analysis.

Samples collected from the drummed solids were analyzed for target compound list (TCL) parameters. Field analysis, was performed using Haz Cat analytical methods to determine pH, solubility and flammability. The investigation identified approximately 700 drums on the site. Many drums are lined with a plastic insert. Laboratory analysis, of the sample collected from the drums containing solids, identified listed CERCLA hazardous substances [40 CFR 302, Table 302.4] that include pentachlorophenol, phenol, 2,4,6 trichlorophenol, chrysene and butyl benzyl phthalate. The health effects of these compounds are shown on table 3. Field analysis of samples collected, identified an acid with a pH less than 2 in one (1) drum containing liquid. The results of the laboratory and field analysis are summarized on table 1 and 2.

D. National Priorities List

This site is not ranked on the National Priorities List (NPL), nor is it proposed to be included on the NPL.

E. State and Local Authorities Roles

The site has been subject to numerous inspections by the EPA, NJDEP, the County Health Department and the Jersey City Fire Department since the late 1970's. The inspections primarily focused on the facilities' drum reconditioning operations which were conducted on the lower parcel of land (Lot 11A).

In 1988, the NJDEP Division of Hazardous Waste Management drafted a directive requiring the owners of Lot 10A (Marie Monck and Richard Pascale) to prepare a cleanup plan addressing the removal/disposal of drums and hazardous materials on the site (Lot 10A). Available site information indicates that the directive was never finalized and issued to the responsible parties.

To date, the only cleanup activities conducted in the area of the site by governmental officials has been the reconstruction of New York Avenue. The road improvement project, implemented by the city of Jersey City, involved resurfacing New York Avenue, removal of trash and debris from New York Avenue and portions of the site and installation of a fence along New York Avenue, adjacent to the site.

The NJDEP Division of Waste Management referred the site to EPA RAB on February 3, 1989. The NJDEP referral letter included in the Attachment.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

A. Threat of Exposure to the Public and Environment

Installation of a chain-link fence around the northwest portion of the property has partially limited access, however, neighborhood children continue to visit the site. This situation was observed during recent site inspections conducted by EPA and TAT. The presence of a fort, constructed of drums, further indicates that the site is actively used by children as a play area. The majority of the drums on the site are in poor condition. Drums identified to contain hazardous substances are situated in the immediate vicinity of the fort. The contents of these drums is accessible, since some of the drums are missing lids or have been vandalized. Due to the condition of the drums and the nature of the materials present, a serious threat of exposure, by direct contact exists to any person who enters the site. Furthermore, since the drums are in poor condition, continued deterioration will result in spillage of material into the environment causing contamination of surface and subsurface soil.

B. Evidence of Extent of Release

Although soil sampling has not been conducted, the release of hazardous substances is suspected, since residues were observed in the vicinity of the drums containing solid material.

C. Previous Action to Abate Threat

To date, the only activities completed in the vicinity of the site has been the reconstruction of New York Avenue. As a result of the road improvement project, surface trash and debris was removed from the site and a chain-link fence was installed adjacent to the property, along New York Avenue.

IV. ENFORCEMENT

The present owners of the property, as listed in Jersey City tax documents are Marie Monck and Richard Pascale. Mrs. Monck and Mr. Pascal, who reside in North Arlington, NJ were the owners/operators of the Ideal Cooperage facility. Attorneys representing the PRPs were advised of EPAs proposed removal activities, and requested to meet with EPA to discuss property cleanup options. On March 9, 1990, EPA met with the PRP's Attorney, the prospective purchaser of the property and the

purchasers environmental consultant. The PRPs Attorney indicated the cleanup would possibly be conducted by the PRP and a work plan detailing the cleanup activities proposed, would be provided to EPA for review. Since the meeting, EPA has not received a workplan from the PRP indicating that the property will be cleaned up.

The NJDEP Bureau of State Case Management has informed EPA that an Administrative Consent Order is being prepared to be issued to Mrs. Monck and Mr. Pascale (owners of Lot 10A) and to the 3-25 New York Avenue Corporation (owner of Lot 11A) to implement a Remedial Investigation and Feasibility Study on their respective properties.

An Administrative Order for the site has been prepared by EPA, and is being reviewed by the Office of Regional Counsel.

V. PROPOSED ACTIONS AND COSTS

A. Proposed Actions

The proposed removal action is to eliminate the threat of direct contact with drummed hazardous substances and to implement a surface and subsurface investigation to identify buried drums and soil contamination. The project objectives can best be accomplished by disposing of the drums containing liquid and solid hazardous materials, and removal of buried drums and/or contaminated soil if warranted. The surficial cleanup program and subsurface investigation will be implemented using a phased approach. Phase I activities will include site preparation, staging and segregating drums based on field screening techniques, excavation of test pits and collection of soil samples for laboratory analysis. Phase II activities will involve bulking and disposal of hazardous materials, crushing and disposal of all empty drums and containers and excavation and removal of contaminated soil and buried drums if warranted. All hazardous materials will be disposed at a RCRA permitted facility in compliance with state and federal regulations. Prior to disposal, all drums will be staged in a secured manner.

Although a long term cleanup plan at the site is not anticipated at this time under this removal action, the actions proposed are consistent, as stated below, with the requirements of Section 104(a)(2) of CERCLA which states that "any removal action undertaken should, to the extent practicable, contribute to the efficient performance of any long term remedial action with respect to the release or threatened release concerned."

The phase I and phase II removal actions will eliminate the release or potential release of hazardous substances in drums and in surface soil on the site into the environment. The proposed

removal action will remove the surficial threats. Since the proposed actions would be part of any future remedial work, the planned work is consistent with any long term remedial action.

B. Estimated Costs

The disposal characteristic analyses of the drummed materials have not been completed, therefore, accurate disposal costs cannot be provided. However, an estimate has been developed so that work at the site can begin. The estimated cost for the removal/disposal of the drummed materials and the surface and subsurface soil investigation are summarized below and detailed in Appendix A.

I. EXTRAMURAL COSTS

A. Mitigation Contractor Costs	\$149,594
20% Contingency	<u>\$ 29,919</u>
Total Extramural Costs	\$179,513
 B. TAT COSTS	 \$ 22,750
 Subtotal Extramural Costs	 \$202,323
15% Contingency	<u>\$ 30,348</u>
Total Extramural Costs	\$232,671

II. INTRAMURAL COSTS

Intramural Direct Costs	\$ 4,125
Intramural Indirect Costs	<u>\$ 8,500</u>
Total Intramural Costs	\$ 12,625
 TOTAL REMOVAL PROJECT CEILING	 \$245,788
ROUNDED REMOVAL CEILING ESTIMATE	\$246,000

C. Project Schedule

Weather permitting, the removal action at the former Ideal Cooperage site will begin within three (3) weeks following approval of this Action Memorandum. The anticipated duration of the on-site activities will be approximately three (3) weeks, depending on the nature of the drum contents. Off-site disposal may require several months to coordinate.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION BE DELAYED

The removal actions discussed in this Action Memorandum are proposed to address the human threat of exposure to hazardous

materials, the environmental threat of spillage of hazardous materials into the environment and the physical threat present with deteriorated drums, haphazardly stockpiled, on the site. Investigations have confirmed that the site is routinely used by children as a play area. Should no action be taken at the site, children using the site risk personal harm from exposure to hazardous substances and deteriorated drums. Furthermore, due to the poor conditions of the drums, spillage of hazardous materials will occur, causing further contamination of surface and subsurface soil.

VII. RECOMMENDATIONS

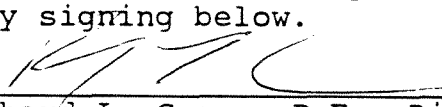
Conditions at the Ideal Cooperage site meet the criteria for a removal action under the NCP Section 300.415(b)(2). Qualifying criteria include the following:

- i. Actual or potential exposure to hazardous substances or pollutants or contaminants of nearby populations, animals, or food chains;
- ii. Hazardous substances or pollutants in drums, barrels, tanks or other bulk storage containers that pose a threat of release;

Based on these conditions, I recommend your approval of the proposed action described above to mitigate the risk to the public. The estimated cost for this project is \$246,000 of which \$180,000 is for mitigation contractor costs.

There are sufficient monies in our current Advice of Allowance to fund this project.

Please indicate your approval per current Delegation of Authority, by signing below.

Approved:  Date: 9/13/90
Richard L. Caspe, P.E., Director
Emergency and Remedial Response Division

Disapproved: _____ Date: _____
Richard L. Caspe, P.E., Director
Emergency and Remedial Response Division

cc: (after approval is obtained) S. Anderson, PM-214F (Exp. Mail)
C. Sidamon-Eristoff, RA S. Luftig, OS-210
R. Caspe, ERR J. Trela, NJDEP
R. Salkie, ERR-ADREPP C. Moyik, ERRD-PS
G. Zachos, ERR-RAB L. Guarneiri, OS-210
J. Frisco, ERR-ADNJP J. Rosianski, OEP
J. Marshall, OEP D. Henne, TATL
D. Karlen, ORC-NJSUP R. Gherardi, OPM-FIN

MAPS AND FIGURES



Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

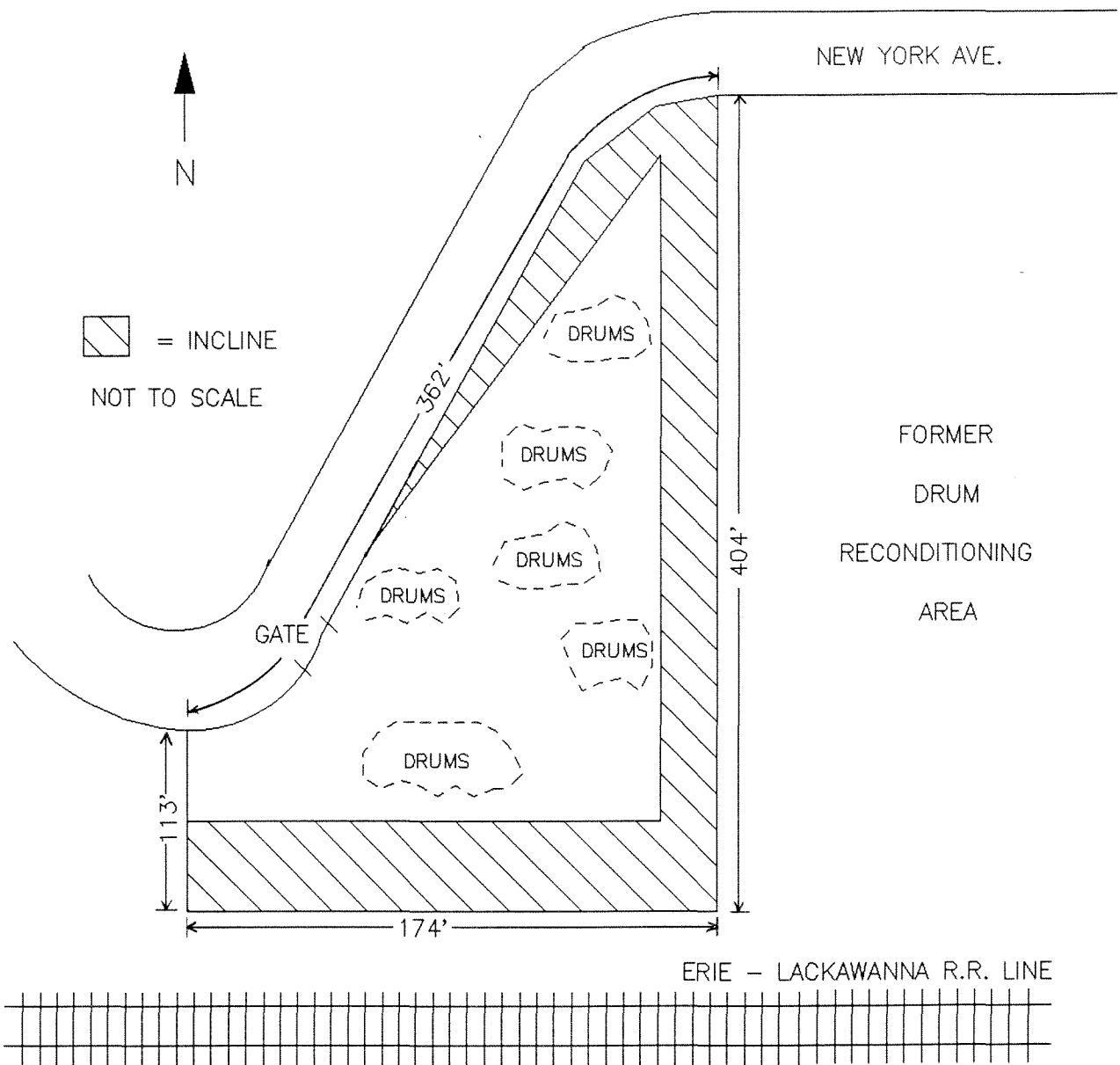
EPA PM
D. HARKAY

FIGURE 1
LOCATION MAP

IN ASSOCIATION WITH FOSTER WHEELER CORP.,
 C.C. JOHNSON & MALHOTRA, P.C., RESOURCE
 APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

TAT PM
P. DI PASCA

IDEAL COOPERAGE
JERSEY CITY, NJ



Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

IN ASSOCIATION WITH FOSTER WHEELER CORP.,
 C.C JOHNSON & MALHOTRA, P.C., RESOURCE
 APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

EPA PM

D. HARKAY

FIGURE 2
 SITE MAP

TAT PM

P. DI PASCA

IDEAL COOPERAGE
 JERSEY CITY, NJ

REQUEST LETTER



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

Michele M. Putnam
Deputy Director

Hazardous Waste Operations

John J. Treja, Ph.D., Director
401 East State St.
CN 028
Trenton, N.J. 08625-0028
(609) 633-1408

Responsible Party Remedial Action

2/16/89
- 751
Lance R. Miller
Deputy Director

FEB 03 1989

Stephen Luftig, Director
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Dear Director Luftig:

Re: Removal Request - Ideal Cooperage
New York Avenue
Jersey City, New Jersey

The New Jersey Department of Environmental Protection hereby submits the Ideal Cooperage site for CERCLA removal action consideration. The following information details the case history and supports the removal request.

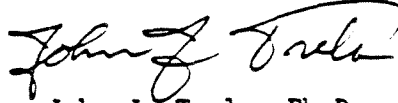
The Ideal Cooperage site is a former drum reconditioning facility located on three acres in the northeast corner of Jersey City, Hudson County. The site is divided by a sharp geological gradient into a lower half (Block 712, Lot 11A), now owned by a trucking company, and an upper half (Block 712, Lot 10A), an undeveloped section used for drum storage where 500-700 drums remain.

Although most drums on the upper half are empty, a number contain unknown liquid or solid materials. Some drums are leaking or unsecured. The site is accessible to the public and is regularly used for dumping of garbage and as a short-cut for pedestrians. Local children are known to play at the site and have built a "fort" out of empty drums. Thus there is a high potential for exposure to these unknown substances.

The current principals of Ideal Cooperage are Marie Monck, widow of the former owner, George Monck, and Oreste J. Pascale who served as the company vice president. The NJDEP is currently preparing a Directive to be issued in early February and is also conducting an investigation to identify additional responsible parties.

This site has received preliminary approval of the USEPA Response and Prevention Branch in Edison; please advise me of your final determination. Should your staff require additional information, please have them contact Ken Kloo of the Bureau of Planning and Assessment at (609) 633-2219. Thank you again for your continued cooperation.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John J. Trela".

John J. Trela, Ph.D.
Director

KK:mz

c: Richard Salkie, USEPA

ANALYTICAL RESULTS

TABLE 1- LABORATORY ANALYSIS

SAMPLING RESULTS SUMMARY FOR DRUMMED SOLID MATERIAL IDEAL COOPERAGE SITE JERSEY CITY, HUDSON COUNTY, NEW JERSEY

	LAB BLANK (UG/L)	FIELD BLANK (UG/L)	SAMP 001 DRUM MAT (UG/KG)	SAMP 002 DRUM MAT (UG/KG)
--	------------------------	--------------------------	---------------------------------	---------------------------------

VOLATILES ORGANICS

METHYL CHLORIDE	ND	ND	ND	ND
METHYL BROMIDE	ND	ND	ND	ND
VINYL CHLORIDE	ND	ND	ND	ND
CHLOROETHANE	ND	ND	ND	ND
METHYLENE CHLORIDE	ND	ND	ND *	ND *
ACETONE	ND	ND	ND	ND
CARBON DISULFIDE	ND	ND	ND	ND
1,1-DICHLOROETHYLENE	ND	ND	ND *	ND *
1,1-DICHLOROETHANE	ND	ND	ND *	ND *
1,2-TRANS DICHLOROETHYLENE	ND	ND	ND *	ND *
CHLOROFORM	ND	ND	ND *	ND *
1,2-DICHLOROETHANE	ND	ND	ND *	ND *
2-BUTANONE	ND	ND	ND	ND
1,1,1-TRICHLOROETHANE	ND	ND	ND *	ND *
CARBON TETRACHLORIDE	ND	ND	ND *	ND *
VINYL ACETATE	ND	ND	ND	ND
DICHLOROBROMOMETHANE	ND	ND	ND *	ND *
1,2-DICHLOROPROPANE	ND	ND	ND *	ND *
1,3-DICHLOROPROPYLENE	ND	ND	ND	ND
TRICHLOROETHYLENE	ND	ND	ND *	ND *
CHLORODIBROMOMETHANE	ND	ND	ND *	ND *
1,1,2-TRICHLOROETHANE	ND	ND	ND *	ND *
BENZENE	0.06 M	ND	ND *	ND *
CIS-1,3-DICHLOROPROPENE	ND	X	ND	ND
BROMOFORM	ND	ND	ND *	ND *
4-METHYL-2-PENTANONE	ND	ND	ND	ND
TETRACHLOROETHYLENE	ND	ND	ND *	ND *
1,1,2,2-TETRACHLOROETHANE	ND	ND	ND *	ND *
2-HEXANONE	ND	ND	28000	24000
TOLUENE	ND	ND	ND *	ND *
CHLOROBENZENE	ND	ND	ND *	ND *
ETHYLBENZENE	ND	ND	ND *	ND *
STYRENE	ND	X	ND	ND
XYLENES (TOTAL)	ND	X	ND	ND

TENTATIVELY IDENTIFIED COMPOUNDS

6-METHYL-2-HEPTANONE	X	X	18000 J	21000 J
2-NONANONE	X	X	1400000 J	X
2-HEPTANONE	X	X	450000 J	440000 J

	LAB BLANK (UG/L)	FIELD BLANK (UG/L)	SAMP 001 DRUM MAT (UG/KG)	SAMP 002 DRUM MAT (UG/KG)
BASE NEUTRALS				
2-CHLOROPHENOL	ND	ND	ND *	ND *
2-NITROPHENOL	ND	ND	ND *	ND *
PHENOL	ND	ND	ND *	6500 M
2,4-DIMETHYLPHENOL	ND	ND	ND *	ND *
2,4-DICHLOROPHENOL	ND	ND	ND *	ND *
2,4,6-TRICHLOROPHENOL	ND	ND	ND *	4000 M
P-CHLORO-M-CRESOL	ND	ND	ND *	13000 M
2,4-DINITROPHENOL	ND	ND	ND	ND
4,6-DINITRO-O-CRESOL	ND	ND	ND *	ND *
PENTACHLOROPHENOL	ND	ND	13000 M	62000 M
4-NITROPHENOL	ND	ND	ND	ND
1,3-DICHLOROBENZENE	ND	ND	ND *	ND *
1,4-DICHLOROBENZENE	ND	ND	ND *	ND *
1,2-DICHLOROBENZENE	ND	ND	ND *	ND *
HEXACHLOROETHANE	ND	ND	ND *	ND *
HEXACHLOROBUTADIENE	ND	ND	ND *	ND *
1,2,4-TRICHLOROBENZENE	ND	ND	ND *	ND *
NAPHTHALENE	ND	ND	ND *	ND *
BIS(2-CHLOROETHYL) ET.	ND	ND	ND *	ND *
BIS(2-CHLOROETHOXY) METH.	ND	ND	ND *	ND *
ISOPHORONE	ND	ND	ND *	ND *
NITROBENZENE	ND	ND	ND *	ND *
N-NITROSODI-N-PROPYLAMINE	ND	ND	ND *	ND *
N-NITROSODIPHENYLAMINE	ND	ND	ND *	ND *
BIS(2-CHLOROISOPROPYL) ET.	ND	ND	ND *	ND *
HEXACHLOROCYCLOPENTADIENE	ND	ND	ND *	ND *
2-CHLORONAPHTHALENE	ND	ND	ND *	ND *
ACENAPHTHYLENE	ND	ND	ND *	ND *
ACENAPHTHENE	ND	ND	ND *	ND *
FLUORENE	ND	ND	ND *	ND *
HEXACHLOROBENZENE	ND	ND	ND *	ND *
4-BROMOPHENYL PHENYL ET.	ND	ND	ND *	ND *
PHENATHRENE	ND	ND	ND *	ND *
ANTHRACENE	ND	ND	ND *	ND *
DIMETHYL PHTHALATE	ND	ND	ND *	ND *
DIETHYL PHTHALATE	0.2 M	ND	ND *	ND *
DI-N-BUTYLPHTHALATE	0.6 M	ND	ND *	ND *
BUTYL BENZYL PHTHALATE	ND	ND	ND *	4800 M
DI-N-OCTYL PHTHALATE	ND	ND	ND *	ND *
BIS(2-ETHYLHEXYL) PHTHAL.	0.9 M	ND	ND *	ND *
FLUORANTHENE	ND	ND	ND *	ND *
PYRENE	ND	ND	ND *	ND *
CHRYSENE	ND	ND	ND *	8000 M
1,2-BENZANTHRACENE	ND	ND	ND *	6500 M
4-CHLOROPHENYL PHENYL ET.	ND	ND	ND *	ND *
INDENO(1,2,3-C,D) PYRENE	ND	ND	ND *	ND *
BENZO(A)PYRENE	ND	ND	ND *	ND *
1,12-BENZOPERYLENE	ND	ND	ND *	ND *
1,2:5,6-DIBENZANTHRACENE	ND	ND	ND *	ND *
3,3'-DICHLOROBENZIDENE	ND	ND	ND *	ND *

	LAB	FIELD	SAMP 001	SAMP 002
	BLANK	BLANK	DRUM MAT	DRUM MAT
	(UG/L)	(UG/L)	(UG/KG)	(UG/KG)

BASE NEUTRALS (CONTINUED)

2,6-DINITROTOLUENE	ND	ND	ND *	ND *
2,4-DINITROTOLUENE	ND	ND	ND *	ND *
1,2-DIPHENYLHYDRAZINE	ND	ND	ND *	ND *
3,4-BENZOFUORANTHENE	ND	ND	ND	ND
11,12-BENZOFUORANTHENE	ND	ND	ND	ND
BENZYL ALCOHOL	ND	ND	ND *	ND *
2-METHYL PHENOL	ND	ND	ND *	ND *
4-METHYL PHENOL	ND	ND	4000 M	4600 M
BENZOIC ACID	ND	ND	ND *	ND *
4-CHLOROANILINE	ND	ND	ND *	ND *
2-METHYL NAPHTHALENE	ND	ND	ND *	ND *
2,4,5-TRICHLOROPHENOL	ND	ND	ND *	ND *
2-NITROANILINE	ND	ND	ND *	ND *
3-NITROANILINE	ND	ND	ND *	ND *
DIBENZOFURAN	ND	ND	ND *	ND *
4-NITROANILINE	ND	ND	ND *	ND *
ANILINE	X	ND	ND *	ND *

	LAB BLANK (UG/L)	FIELD BLANK (UG/L)	SAMP 001 DRUM MAT (UG/KG)	SAMP 002 DRUM MAT (UG/KG)
PESTICIDES AND PCBs				
ALDRIN	ND	ND	ND	ND
DIELDRIN	ND	ND	ND	ND
CHLORDANE	ND	ND	ND	ND
ALPHA CHLORDANE	ND	ND	ND	ND
BETA CHLORDANE	ND	ND	ND	ND
GAMMA CHLORDANE	ND	ND	ND	ND
4,4'-DDT	ND	ND	ND	ND
4,4'-DDE	ND	ND	ND	ND
4,4'-DDD	ND	ND	ND	ND
ALPHA ENDOSULFAN	ND	ND	ND	ND
BETA ENDOSULFAN	ND	ND	ND	ND
ENDOSULFAN SULFATE	ND	ND	ND	ND
ENDRIN	ND	ND	ND	ND
ENDRIN ALDEHYDE	ND	ND	ND	ND
ENDRIN KETONE	ND	ND	ND	ND
HEPTACHLOR	ND	ND	ND	ND
HEPTACHLOR EPOXIDE	ND	ND	ND	ND
ALPHA-BHC	ND	ND	ND	ND
BETA-BHC	ND	ND	ND	ND
GAMMA-BHC	ND	ND	ND	ND
DELTA-BHC	ND	ND	ND	ND
METHOXYCHLOR	ND	ND	ND	ND
TOXAPHENE	ND	ND	ND	ND
PCB-1016	ND	ND	ND	ND
PCB-1221	ND	ND	ND	ND
PCB-1232	ND	ND	ND	ND
PCB-1242	ND	ND	ND	ND
PCB-1248	ND	ND	ND	ND
PCB-1254	ND	ND	ND	ND
PCB-1260	ND	ND	ND	ND

	LAB BLANK (UG/L)	FIELD BLANK (MG/L)	SAMP 001 DRUM MAT (MG/KG)	SAMP 002 DRUM MAT (MG/KG)
TOTAL METALS AND CYANIDES				
SILVER	X	ND	ND	ND
ALUMINUM	X	0.081 M	256.0	190.0
ARSENIC	X	ND	ND	0.5 M
BARIUM	X	ND	8.00	8.13
BERYLLIUM	X	ND	ND	ND
CALCIUM	X	0.2 M	3080	3470
CADMIUM	X	ND	ND	ND
COBALT	X	ND	7.77	7.83
CHROMIUM	X	ND	14.0	13.3
COPPER	X	ND	32.6	38.6
IRON	X	ND	4599	5678
MERCURY	X	ND	ND	ND
POTASSIUM	X	32.3 J	123.9 J	97.2 J
MAGNESIUM	X	0.2	170.0	166.0
MANGANESE	X	ND	62.3	65.9
SODIUM	X	0.34 J	2416 J	2356 J
NICKEL	X	ND	957	955
LEAD	X	ND	30.8	27.8
ANTIMONY	X	ND	ND	ND
SELENIUM	X	ND	ND	ND
THALLIUM	X	ND	ND	ND
VANADIUM	X	ND	1.37	1.25
ZINC	X	ND	81.1	78.6
CYANIDES	X	X	ND	ND

KEY:

- J : INDICATES AN ESTIMATED VALUE.
- M : INDICATES PRESENCE OF MATERIAL VERIFIED, BUT NOT QUANTIFIED.
- ND : INDICATES COMPOUND WAS ANALYZED FOR BUT NOT DETECTED.
- ND * : INDICATES COMPOUND WAS ANALYZED FOR BUT NOT DETECTED AT ELEVATED DETECTION LIMITS.
- X : INDICATES COMPOUND WAS NOT ANALYZED.

TABLE 2

RESULTS FROM FIELD TESTING OF DRUMS AT IDEAL COOPERAGE SITE, NOVEMBER 10, 1989

SAMPLE #	SAMPLE STATE	HNU READING	WATER SOLUBILITY	HEXANE SOLUBILITY	SPECIFIC GRAVITY	PH	FLAMMABILITY TEST
T-1	LIQUID, CLEAR	0	100 %	0 %	1.000	6-7	FAILS
T-2	LIQUID, RUSTY	0	100 %	0 %	1.000	6-7	FAILS
T-3	LIQUID, RUSTY	0	100 %	0 %	1.000	6-7	FAILS
T-4	SOLID, BLACK	0	0 %	100 %	N/A	5-6	MELTS
T-5	LIQUID, SOAPY	0	100 %	0 %	NOT DONE	8	FAILS
T-6	SOLID, BLACK	0	0 %	100 %	N/A	6	MELTS
T-7	SOLID, BLACK	0	0 %	100 %	N/A	5	MELTS
T-8	LIQUID, CLEAR	150	100 %	0 %	NOT DONE	1	FAILS

OBSERVATIONS AND CONCLUSIONS:

SAMPLES T-1, T-2, T-3: DRUMS CONTAIN WATER, PROBABLY RAINWATER

SAMPLES T-4, T-6, T-7: SAMPLES HAD A CRAYON-LIKE ODOR AND WAXY CONSISTENCY AFTER FLAME TEST
DRUMS CONTAIN AN ORGANIC SOLID

SAMPLE T-5: DRUM CONTAINS WATER WITH SURFACTANT

SAMPLE T-8: SAMPLE HAD A VINEGAR ODOR; DRUM CONTAINS ACETIC ACID

TABLE 3

IDEAL COOPERAGE

Potential Health Effects For Hazardous Substances

	1. CARCINOGENIC								
	2. TERATOGENIC								
	3. MUTAGENIC								
	4. TOXIC BY INHALATION, INGESTION, OR DERMAL CONTACT								
	5. CENTRAL NERVOUS SYSTEM EFFECTS								
	6. EYE, SKIN, RESPIRATORY OR MUCOUS MEMBRANE IRRITANT								
	7. LIVER DAMAGE								
	8. KIDNEY DAMAGE								
	9. CARDIOVASCULAR DAMAGE								
Pentachlorophenol	X		X	X	X	X	X	X	X
Phenol			X		X	X	X		
2,4,6 Trichlorophenol	X			X					
Butyl Benzyl Phthalate					X				
Chrysene	X				X	X			
Acid			X	X	X			X	

TAT-02-F-06208

WORK PLAN FOR THE
IDEAL COOPERAGE SITE
JERSEY CITY, HUDSON COUNTY, NEW JERSEY

FEBRUARY 1991

Prepared by:

Peter Di Pasca, Jr.
Roy F. Weston, Inc.
Major Programs Division
Technical Assistance Team
Edison, New Jersey

For:

J. Daniel Harkay
United States Environmental Protection Agency
Removal Action Branch
Edison, New Jersey

I. SITE BACKGROUND

The Ideal Cooperage site is located at 3-25 New York Avenue in Jersey City, Hudson County, New Jersey. Figure 1 provides a site location map. The approximately 2-acre site is situated in an industrial section of the city. The site is bounded on the north and west by New York Avenue, on the south by the Erie-Lackawanna Rail Line and on the east by a developed lot. The property is relatively flat and elevated, with the northern, eastern and southern perimeters sloping downward toward the property line. Figure 2 provides a site map. The ground consists of loose soil with low brush and some small trees.

During the 1970s, Ideal Cooperage, Inc. used the site as part of their drum reconditioning operations. Although the actual rinsing and reconditioning of the drums were performed on an adjacent lot, empty drums were stored on this site. In the fall of 1981, Ideal Cooperage ceased operations and abandoned both properties. The property on which the processing took place was eventually sold and redeveloped; however, the lot which was used for storage still remains abandoned.

Assessments performed by the New Jersey Department of Environmental Protection (NJDEP) and, more recently, by the USEPA Technical Assistance Team (TAT) have determined that approximately 600 drums remain on-site. Most of these drums are empty, but about 10% contain material. Since many of the drums containing liquid are upright and missing bungs, the liquid may be rainwater. A majority of the empty drums are severely deteriorated and appear to have been on the property for several years. A subsurface soil investigation conducted several years ago by a private consultant detected low levels of toluene, perchloroethylene, and petroleum hydrocarbons. In addition, buried drums may be present on the site.

The site had been used in recent years as an illegal dumping ground for household garbage, construction debris, and abandoned automobiles. Seventeen rolloff containers of solid waste were once cleared from the site, but lack of security made it impossible to keep the property free of trash. In April 1989, the Jersey City Department of Engineering performed renovations on the section of New York Avenue bordering the site. Included in these renovations were the installation of sidewalks, guard rails, and a chain-link fence along the northern and western borders of the site. Although these improvements have prevented the dumping of trash and debris onto the site, the property is still frequented by trespassers. Neighborhood children have also used the site as a playground, and had even built a "fort" using empty drums.



Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

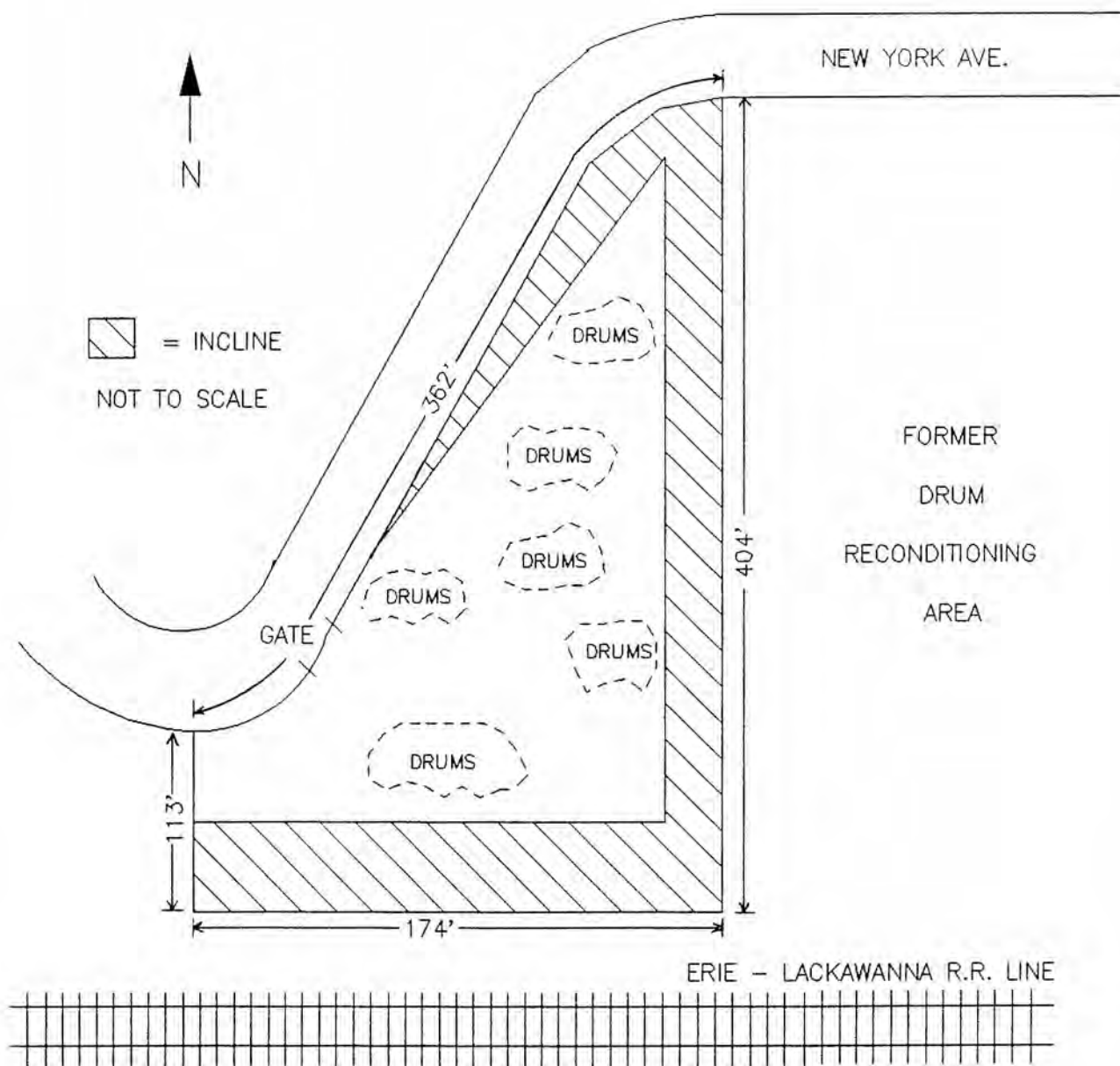
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 APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

EPA PM
 D. HARKAY

TAT PM
 P. DI PASCA

FIGURE 1
 LOCATION MAP

IDEAL COOPERAGE
 JERSEY CITY, NJ



Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

IN ASSOCIATION WITH FOSTER WHEELER CORP.,
C.C JOHNSON & MALHOTRA, P.C., RESOURCE
APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

EPA PM
D. HARKAY

FIGURE 2
SITE MAP

TAT PM
P. DI PASCA

IDEAL COOPERAGE
JERSEY CITY, NJ

II. OBJECTIVES

The objectives of this removal action are to:

1. Properly classify and dispose of all surficial drums;
2. Determine whether buried drums are present on-site;
3. Determine whether surface and/or subsurface soil contamination has occurred.

III. SCOPE OF WORK

The scope of work is to provide the following services:

1. Site Preparation - In order to provide working space and greater access to surficial drums, brush and small tree removal will be required. Placement of crushed stone directly inside the front gate will also be needed to keep the migration of dust and mud from the site to a minimum. Removal of scrap material and minor grading may also be required.
2. Drum Staging and Segregation - All surficial drums will be restaged for sampling and classification. Overpacking and/or transfer of contents from deteriorated drums will be required. Drums containing liquid or solid material will be staged on plastic sheeting according to drum type and physical characteristics of contents. RCRA-empty drums will be segregated and shipped to a drum recycling facility. Staging areas for filled and empty drums will be determined by the EPA On-Scene Coordinator (OSC).
3. Field Screening and Test Bulking - Samples from all drums containing liquid and solid material will be sampled and screened on-site to determine waste classifications. Field tests will include water and hexane solubilities, pH, ignitibility and oxidizer tests, and HNu-PID screening. Sample phase and color will also be noted. Samples with similar characteristics will then be test-bulked in sample jars to verify compatibility.
4. Drum Bulking and Disposal - Compatible drum contents will be bulked in 55-gallon open-head drums. Representative samples will then be collected from the bulked drums and sent for laboratory analysis. Waste characterization forms will be completed based on the laboratory analysis and sent to prospective offsite TSDFs. After disposal approval from the TSDF(s) is granted, transportation and offsite disposal will be arranged.

5. Test Pit Excavation - Six test pits will be excavated to a maximum depth of 16 feet to determine whether drums are buried on-site. Subsurface soil samples will be collected from the backhoe bucket at various depths to identify soil types. These samples will also be sent for laboratory analysis to determine if subsurface soil contamination has occurred. Locations of test pits will be determined by the EPA OSC.

Refer to the "Scope of Work" Section of the Project Sampling Plan II for additional information on the drum sampling, test pit investigation, and sample analysis phases of the project.

IV. GENERAL REQUIREMENTS

Equipment and Personnel to be Furnished by the ERCS Contractor

The ERCS Contractor shall provide a backhoe with blast shield and the necessary equipment and personnel to complete the task described herein and to meet the goals of the delivery order. During test pit excavation, ERCS shall provide two technicians, in addition to an experienced backhoe operator. ERCS shall maintain the equipment in good operating condition for the duration of the removal action.

Working Schedule

All site work shall be done during daylight hours. At the beginning of the project, EPA, TAT and ERCS shall mutually agree on a work schedule. If certain phases of work must be continued into the hours of darkness, sufficient lighting shall be provided by the ERCS Contractor so that work may be carried out in a safe and efficient manner. If the schedule of work hours is to be changed, EPA, TAT and ERCS shall mutually agree to such change 24 hours in advance.

Equipment Protection and Security

The ERCS Contractor is responsible for providing any and all security measures required to protect equipment and materials at the site. Services of a security agency may be subcontracted for nighttime security.

Mobilization/Demobilization

The ERCS Contractor is responsible for mobilizing to the site all material, personnel, equipment and tools required to perform the specific work and removing the same from the site at the completion of work.

Decontamination

The ERCS Contractor is responsible for the cleaning and decontamination of the backhoe and other related equipment. Steam cleaning of the backhoe bucket may be required upon arrival to and departure from the site. Water to be used for decontamination purposes shall be stored in a portable tank. Electricity shall be provided by portable generator. No on-site source of water or electricity is available.

Period of Performance

Project initiation is anticipated to be during the month of March 1991. The period of performance for the work described in this work plan is estimated as follows:

Mobilization and site preparation:	2 - 3 days
Drum staging and segregation:	4 - 5 days
Field screening and test bulking:	1 - 2 days
Drum bulking and disposal:	1 - 2 days*
Test pit excavation:	2 - 3 days
Demobilization:	1 day

- *: While actual site work will only last several days, a demobilization period of several weeks between drum bulking and disposal is likely for analytical results and disposal acceptance to be received and reviewed.

V. HEALTH AND SAFETY PROTOCOL

The ERCS Contractor will be expected to comply with all approved site health and safety requirements. There will be an EPA/Weston Site Health and Safety Plan implemented for this site. All activities at the site shall be conducted in accordance with current Occupational Health and Safety Regulations for Hazardous Waste Site Activities (References: OSHA 29 CFR 1910.120; 29 CFR 1926/1910 Construction Industry Standards). ERCS will also be required to follow their own safety protocols.

Required Personnel Protective Equipment

The ERCS Contractor shall provide the following personal protective clothing and respiratory protection equipment:

<u>Expendables:</u>	Coveralls - Paper Tyvek, Polytyvek or Saranex
	Inner Gloves - Latex or Vinyl
	Outer Gloves - Solvex or Nitrile
	Duct Tape - For joints between clothing items
	Air-Purifying Respirator Canisters and/or Cartridges - MSA GMC-H or equivalent (discard as necessary)
<u>Non-Expendables:</u>	Full-Face Air Supplying Respirator - SCBA or airline system with escape bottle
	Full-Face Air Purifying Respirator - half-face units unacceptable
	Hard Hat
	Steel-Toe Neoprene Boots

Levels of Respiratory Protection

The levels of respiratory protection required are task-related and listed below:

<u>Task</u>	<u>Level of Respiratory Protection</u>
Site Preparation	Level C - When working near unsecured drums
	Level D - When working in open areas
Drum Staging and Segregation	Level B - When handling unknown drums; may downgrade to level C as determined by the Site Health and Safety Officer
	Level D - When handling drums that have been confirmed empty and dry

Field Screening
and Test Bulking

Level D - If sample quantities are
small and screening is
performed outside or
under a vent hood

Drum Bulking

Level B - During all bulking
operations

Excavation of Test
Pits

Level C - Backhoe operator must
also
wear escape pack

ERCS Contractor Health and Safety Requirements

The ERCS Contractor will be required to certify that:

- All ERCS personnel involved in work activities on-site:
 - a) Understand and agree to the provisions of the Site Health and Safety Plan.
 - b) Understand that the work is to be performed on a hazardous materials site and that protective clothing and respiratory protective devices will be required.
 - c) Have been examined by a licensed physician in accordance with 29 CFR 1910.120.
 - d) Have been trained in accordance with applicable sections of 29 CFR 1910.120 and 29 CFR 1926/1910.
 - e) Have agreed to work under the direction of the Site Health and Safety Officer.
- All equipment used by ERCS personnel is NIOSH/OSHA approved, as appropriate, and in working condition as specified by the manufacturer.
- All respiratory and personnel protection programs established by ERCS for this site are in compliance with 29 CFR 1910.120 and 29 CFR 1926/1910.
- A Health and Safety Program is maintained in accordance with the applicable sections of 29 CFR 1910.120.

TAT-02-F-06181

SITE SAFETY PLAN

Project Name: Ideal Cooperage

3 - 25 New York Avenue

Jersey City, Hudson County, NJ 07307

ERCS Delivery Order #: 0102-02-016

TAT Technical Direction Document #: 02-9010-0065

U.S. EPA Site I.D.#: 6P

Prepared by:

Roy F. Weston, Inc.
Major Programs Division
Technical Assistance Team
Edison, New Jersey

for:

The U.S. Environmental Protection Agency
Region II - Emergency and Remedial Response Division
Edison, New Jersey

Adopted By: Ed Miller
For S & D Environmental Services, Inc.

Date: 3/28/91

Adopted By: Michael R. [Signature]
For Roy F. Weston, Inc.

Date: 1/15/91

Adopted By: Dan Harahan
For U.S. EPA

Date: 3/12/91

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- ATTACHMENT E - DRUM SAMPLING SOP
- ATTACHMENT F - SOIL SAMPLING SOP
- ATTACHMENT G - EXCAVATION SOP
- ATTACHMENT Z - SITE SAFETY PLAN ACKNOWLEDGEMENT FORM

GLOSSARY OF ACRONYMS

ANSI	- AMERICAN NATIONAL STANDARDS INSTITUTE
APR	- AIR PURIFYING RESPIRATOR
ACGIH	- AMERICAN CONFERENCE OF GOVERNMENTAL INDUSTRIAL HYGIENISTS
CFR	- CODE OF FEDERAL REGULATIONS
CGI/O ₂	- COMBUSTIBLE GAS INDICATOR / OXYGEN METER
ERCS	- EMERGENCY RESPONSE CLEANUP SERVICES
HNU-PID	- HNU PHOTOIONIZATION DETECTOR
IDLH	- IMMEDIATELY DANGEROUS TO LIFE & HEALTH
NIOSH	- NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY & HEALTH
OSC	- ON-SCENE COORDINATOR
OSHA	- OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
OVA	- ORGANIC VAPOR ANALYZER
PPM	- PARTS PER MILLION
RM	- RESPONSE MANAGER
SCBA	- SELF-CONTAINED BREATHING APPARATUS
SM	- SUBCONTRACTOR MANAGER
SOP	- STANDARD OPERATING PROCEDURE
SPCC	- SPILL PREVENTION CONTROLS & COUNTERMEASURES
TAT	- TECHNICAL ASSISTANCE TEAM
TLV	- THRESHOLD LIMIT VALUE
U.S. EPA	- U.S. ENVIRONMENTAL PROTECTION AGENCY

INTRODUCTION AND SITE ENTRY REQUIREMENTS

This document describes the health and safety guidelines developed for this project to protect on-site personnel, visitors, and the public from physical harm and exposure to hazardous materials or wastes. The procedures and guidelines contained herein were based upon the best available information at the time of the plan's preparation. Specific requirements will be revised when new information is received or conditions change and a safety plan modification is necessary to ensure the safety of workers or the public. A written amendment will document all changes made to the plan. Amendments to this plan are included in Attachment A. Where appropriate, specific OSHA standards or other guidance will be cited and applied.

DAILY SAFETY MEETINGS

Daily safety meetings will be held at the start of each shift to ensure that all personnel understand site conditions and operating procedures, to ensure that personal protective equipment is being used correctly and to address worker health and safety concerns.

SITE SAFETY PLAN ACCEPTANCE ACKNOWLEDGEMENT

The OSC or designated representative shall be responsible for informing all individuals entering the exclusion zone of the contents of this plan and ensuring that each person signs the Safety Plan Acknowledgment Form in Attachment Z. By signing this form, individuals are recognizing the hazards present on-site and the policies and procedures required to minimize exposure or adverse effects of these hazards.

TRAINING REQUIREMENTS

All personnel (including visitors) entering the exclusion zone must have completed training requirements for hazardous waste site work in accordance with OSHA 29 CFR 1910.120, or be qualified by previous training or experience. Documentation of training requirements is the responsibility of each employer.

MEDICAL MONITORING REQUIREMENTS

All personnel (including visitors) entering the exclusion zone must have completed appropriate medical monitoring requirements required under OSHA 29 CFR 1910.120(f). Documentation of medical monitoring is the responsibility of each employer. If there are additional medical monitoring requirements for this site, evidence of compliance must also be included.

FIT TESTING REQUIREMENTS

All personnel (including visitors) entering the exclusion zone using a full-face negative pressure respirator must have successfully passed a qualitative respirator fit test in accordance with OSHA 29 CFR 1910.1025, 1926.58, or ANSI within the last 12 months. Documentation of fit testing is the responsibility of each employer. If applicable, quantitative fit testing is required for the use of negative pressure respirators for protection against airborne asbestos fibers and lead.

1.0 SITE BACKGROUND AND SCOPE OF WORK

1.1 ROLES AND RESPONSIBILITIES

On-Scene Coordinator (OSC):

The OSC, as the representative of the U.S. EPA, is responsible for overall project administration and for coordinating health and safety standards for all individuals on-site at all times. All applicable OSHA standards shall be applied. However, each contractor (as an employer under OSHA) is also responsible for the health and safety of its employees. If there is any dispute with regards to health and safety, the following procedures shall be followed:

- 1) Attempt to resolve the issue on-site; and,
- 2) If the issue cannot be resolved, on-site personnel shall consult offsite supervisors for assistance and the specific task operation in dispute shall be discontinued until the issue is resolved.

Response Manager (RM):

The Response Manager, as the field representative for the ERCS cleanup contractor, has the responsibility for fulfilling the terms of the delivery order. The RM must oversee the project and ensure that all technical, regulatory and safety requirements are met. It is the RM's responsibility to communicate daily with the OSC regarding site cleanup progress and any problems encountered.

Technical Assistance Team (TAT):

The Technical Assistance Team is responsible for providing the OSC with assistance and support in regards to all technical, regulatory and safety aspects of site activity. TAT is also available to advise the OSC on matters relating to sampling, treatment, packaging, labeling, transport, and disposal of hazardous materials, but is not limited to the abovementioned.

1.2 Key Personnel

U.S. EPA On-Scene
Coordinator (OSC):

J. Daniel Harkay
U.S. EPA Region II
2890 Woodbridge Ave., Bldg. 209
Edison, New Jersey 08837
(201) 321-6614

Alternate OSC:

Joseph Rotola
U.S. EPA Region II
2890 Woodbridge Ave., Bldg. 209
Edison, New Jersey 08837
(201) 321-6652

ERCS Contractor:

S & D Environmental Services
2 Gourmet Lane
Edison, New Jersey 08837
(201) 549-8778

ERCS Response Manager (RM):

Edward Twilley

Site Health & Safety Officer:

OSC

Alt. Health & Safety Officer:

Peter Di Pasca, Jr.

Technical Assistance Team (TAT):

Roy F. Weston, Inc.
1090 King Georges Post Road
Suite 201
Edison, New Jersey 08837
(201) 225-6116

TAT Representative:

Peter Di Pasca, Jr.

1.3 Site Background

The Ideal Cooperage site is located on New York Avenue in Jersey City, Hudson County, New Jersey. A location map is provided in Attachment B. The site encompasses approximately 2 acres and is situated in an industrial section of the city. The site is bounded on the north and west by New York Avenue, on the south by the Erie-Lackawanna Rail Line and on the east by a developed lot. The elevated property is relatively flat, with the northern, eastern and southern perimeters sloping downward toward the property line. A site map is provided in Attachment B. Low brush and small trees cover the surface area of the site.

During the 1970s, Ideal Cooperage Inc. used the site for drum reconditioning operations. The actual rinsing and reconditioning of the drums were performed on an adjacent lot; the lot under investigation was used for empty drum storage. In the fall of 1981, Ideal Cooperage ceased operations and filed for bankruptcy. The property used for drum processing was sold and redeveloped. The lot used for drum storage was sold to the former principals of the company.

Assessments performed by the New Jersey Department of Environmental Protection (NJDEP) and, more recently, by the U.S. EPA Technical Assistance Team (TAT), have identified approximately 600 drums on-site. Most of the drums are empty, however about 10% contain material. Many empty drums are severely deteriorated and appear to have been on the property for several years. Since most drums containing liquid are upright and missing bungs, the liquid may be rainwater. Field testing and laboratory analysis of samples collected from sealed drums in November 1989 revealed the presence of acetic acid in one drum and organic esters and phenol compounds in another fourteen drums. A subsurface soil investigation conducted by a private consultant several years ago identified low levels of toluene, perchloroethylene, and petroleum hydrocarbons. Available site data indicate drums may be buried below the surface of the property.

The site has been used in recent years as an illegal dump for household garbage, construction debris, and abandoned automobiles. Seventeen rolloff containers of solid waste were cleared from the site by the City of Jersey City, but lack of security prevented keeping the property free of trash. In April, 1989, the Jersey City Department of Engineering repaved New York Avenue and installed sidewalks, guard rails, catch basins, and a chain-link fence around the site. These renovations have improved conditions at the site considerably. However, neighborhood children continue to use the site as a playground, and have constructed a "fort" using empty drums.

1.4 Scope of Work for ERCS Contractor

The ERCS Contractor will provide the following services:

1. Site preparation as required, such as brush removal, scrap material removal, minor grading, and placement of crushed stone at entrance to site.
2. Staging and segregation of all surficial drums. Overpack and/or transfer contents from deteriorated drums, as required. Staging area will be determined by the EPA OSC.
3. Excavation of six test pits to a maximum depth of 16 feet. Locations will be determined by the EPA OSC and TAT Representative.

1.5 Scope of Work for TAT

TAT will provide technical assistance for all phases of the removal action. Duties will include air monitoring with an HNu (photoionization detector), an OVA (organic vapor analyzer), and a CGI/O₂ (combustible gas indicator / oxygen meter). TAT will also monitor and photodocument ERCS' on-site activities, collect soil and drum samples, and conduct field compatibility testing of all hazardous materials discovered on-site. Other activities include cost accounting and any other site-specific tasks which may require technical expertise.

2.0 TASK SAFETY AND HEALTH RISK ANALYSIS

This Hazard Assessment identifies the general hazards associated with specific site operations and presents an analysis of documented or potential chemical hazards that exist at the site. Every effort must be made to reduce or eliminate these hazards. Those which cannot be eliminated must be guarded against by use of engineering controls and/or personal protective equipment.

2.1 Activity Specific Hazards and SOPs

2.1.1 Hazards and SOPs Associated with Site Preparation:

- Hand and automatic tools
- Heavy machinery
- Slip, trip, fall
- Inhalation of dusts
- Punctures
- Noise

In order to safely and efficiently restage drums and excavate test pits, minor site preparation will be required. This activity may include the cutting and removal of brush and small trees, relocation and/or removal of scrap material, and minor grading of soil. Crushed stone will also be placed directly inside the front gate to prevent the migration of dust and mud from the site. Since tools such as clippers, sickles, and "weed wackers" may be used, care should be exercised to prevent hand or leg injuries. If a "Bobcat" or backhoe is used, operators must be aware of other personnel in the vicinity.

2.1.2 Hazards and SOPs Associated with Drum Staging & Segregation:

- Back strain
- Slip, trip, fall
- Splash hazard from open containers
- Inhalation of vapors/dusts

Proper lifting techniques must be used when restaging empty drums or overpacking solids drums. When drums containing material are restaged, one must be aware that many drums are missing bungs and may have a tendency to splash. If liquid needs to be transferred from containers in order for the containers to be moved, hand pumps will be used and a splash hazard will again be present.

2.1.3 Hazards and SOPs Associated with Drum Overpacking:

- Splash hazard
- Heavy equipment
- Slip, trip, fall
- Inhalation of hazardous vapors or dusts
- Punctures
- Noise

Precautions will be taken to reduce physical hazards. Materials which have a tendency to splash and drums which are in poor condition will be handled with extreme care. A "Bobcat" or backhoe will be used when possible to reduce the chances of a worker becoming injured when attempting to lift or move a heavy drum. Equipment operators must be aware of other personnel in the vicinity when overpacking any drums.

2.1.4 Hazards and SOPs Associated with Drum Sampling:

- Splash hazard from open containers
- Inhalation of vapors or dusts
- Punctures
- Slip, trip, fall

Caution will be used to reduce the physical hazards of the job. When opening sealed drums, all liquids and solids will be assumed hazardous, and non-sparking bung wrenches and tools will be used. Most of the liquid in open drums is assumed to be rainwater. However, residues remaining in the drums may have contaminated the liquid. Therefore, all safety precautions for drum sampling must be followed.

2.1.5 Hazards and SOPs Associated with Test Pit Excavation:

- Heavy machinery
- Slip, trip, fall
- Noise
- Inhalation of dust

When the backhoe is being used, the operator must be aware of other personnel in the vicinity. When walking, personnel should also be conscious of pits that have already been excavated. No personnel are to enter an excavation. If buried drums are discovered, the excavation will be backfilled.

2.1.6 Hazards and SOPs Associated with Soil Sampling:

- Inhalation of dusts
- Slip, trip, fall
- Heavy machinery

Subsurface soil samples will be collected from the test pits via the backhoe bucket. Therefore, care should be exercised when working near the backhoe and the excavation pit.

2.2 General Site Hazards

Lighting - Work areas must have adequate lighting for employees to see to work and identify hazards (5 foot-candles minimum - comparable to a single 75-100 watt bulb). Personnel should carry flashlights in all normally dark areas. Applicable OSHA standards for lighting - 29 CFR 1910.120 (m) - shall apply.

Electrical Power - All electrical power must have a ground fault circuit interrupter as part of the circuit. All equipment must be suitable and approved for the class of hazard. Applicable OSHA standards for electrical - 29 CFR 1926 Subpart "K" shall apply.

High or Elevated Work - All work over four feet in elevation or where a fall potential exists will be performed using appropriate ladders and/or fall protection (i.e. body harness and lifeline).

Drum Handling - The movement and opening of drums will be done in accordance with 29 CFR 1910.120 (j).

Cold Stress - When the temperature falls below 40°F, cold stress protocol shall be followed. Employees must be supplied with adequate clothing to maintain core temperature. Cold stress is discussed in detail in Attachment C.

Eye Wash Protection - All operations involving the potential for eye injury, splash, etc., must have approved eye wash units locally available as per 29 CFR 1910.151 (c).

Fire Protection/Fire Prevention - Operations involving the potential for fire hazards shall be conducted in a manner as to minimize the risk. Non-sparking tools and fire extinguishers shall be used or available as appropriate. Sources of ignition shall be removed. When necessary, explosion-proof instruments and/or bonding and grounding will be used to prevent fire or explosion.

Utilities - Overhead and underground utility hazards shall be identified and/or inspected prior to conducting operations involving potential contact.

2.3 Suspected Chemical Hazards

Previous sampling and analytical data have indicated that the following chemical hazards potentially exist at the site. Based on visual observations, all open containers are assumed to contain rainwater. However, the rainwater may have been contaminated by residues in the drums. Furthermore, several sealed drums have been found to contain hazardous materials. The following table presents industrial hygiene information on several compounds discovered on-site. Material Safety Data Sheets for these compounds can be found in Attachment D.

Suspected Contaminants	TLV PEL	IDLH	Physical Characteristics	Routes of Exposure	Symptoms of Acute Exposure	First Aid	Instruments To Detect
Acetic Acid	10 ppm	1000 ppm	Colorless liquid or solid with a strong vinegar-like odor	Inh	Irrit nose, throat; chronic bron; burns eyes, skin; skin sens.	Eye: Irr immed Skin: Water flush immed Breath: Art resp Swallow: Med attn immed	pH paper; HNu with 11.7 probe; OVA
Methyl n-amyl ketone (2-heptanone)	100 ppm	4000 ppm	Clear, colorless liquid with a mild, banana oil-like odor	Inh Ing Con	Irrit eyes, muc memb; head; narcosis, coma; dermat	Eye: Irr immed Skin: Soap wash Breath: Fresh air Swallow: Med attn immed	HNu with 10.2 probe; OVA
Methyl n-butyl ketone (2-hexanone)	100 ppm	5000 ppm	Colorless liquid with a characteristic odor	Inh Abs Ing Con	Irrit eyes, nose; weak; dermat; head; drows	Eye: Irr immed Skin: Soap wash immed Breath: Art resp Swallow: Med attn immed	OVA
Pentachlorophenol (PCP)	0.5 mg/m ³	150 mg/m ³	Light brown solid with a pungent odor when hot	Inh Abs Ing Con	Irrit eyes, nose, throat; sneez, cough; sweat; head; dizz; nau, vomit; chest pain; dermat	Eye: Irr immed Skin: Soap wash immed Breath: Art resp Swallow: Med attn immed	OVA
Phenol	5 ppm	250 ppm	Colorless to pink solid or thick liquid with a characteristic, sweet, tarry odor	Inh Abs Ing Con	Irrit eyes, nose, throat; weak, muscle ache, pain; skin burn; dermat; tremor, convuls; twitch	Eye: Irr immed Skin: Soap wash immed Breath: Art resp Swallow: Med attn immed	HNu with 10.2 probe; OVA

3.0 TRAINING AND FIT TESTING REQUIREMENTS

Refer to Introduction for Site Entry Requirements.

4.0 PERSONAL PROTECTIVE EQUIPMENT

The following is a brief description of the personal protective equipment which may be required during various phases of the project. The U.S. EPA terminology for protective equipment will be used: Levels A, B, C and D.

Respiratory protective equipment shall be NIOSH-approved and use shall conform to OSHA 29 CFR Part 1910.134 requirements. Each employer shall maintain a written respirator program detailing selection, use, cleaning, maintenance and storage of respiratory protective equipment.

4.1 Level A Protection Shall Be Used When:

- o The extremely hazardous substance requires the highest level of protection for skin, eyes and the respiratory system;
- o Substances with a high degree of hazard to the skin are known or suspected;
- o Chemical concentrations are known to be above IDLH levels;
- o Biological hazards requiring Level A are known or suspected; or,
- o Unknown organic vapor concentrations range from 500 - 1,000 ppm.

4.1.1 Level A Protective Equipment at a Minimum Shall Consist of:

- o Fully encapsulating exposure suit (selected for resistance to chemical(s) at the site);
- o Chemical resistant boot covers worn over safety-toe work boots;
- o Chemical resistant outer gloves (disposable);
- o Chemical resistant inner gloves (disposable);
- o Pressure demand SCBA or airline system with egress bottles;
- o Hard-hat;
- o Disposable outer suit (optional);
- o Use of the "buddy system" for site entry personnel and appropriate back-up support personnel.

4.2 Level B Protection Shall Be Used When:

- o The substance(s) has been identified and requires a high level of respiratory protection but less skin protection;
- o Concentrations of chemicals in the air are IDLH or above the maximum use limit of an APR with full-face mask;
- o Oxygen deficient or potentially oxygen deficient atmospheres (<19.5%) are possible;
- o Confined space entry requires Level B; or,
- o Unknown organic vapor concentrations range from 5 - 500 ppm and a significant skin hazard is not anticipated.

4.2.1 Level B Protective Equipment at a Minimum Shall Consist of:

- o Chemical-resistant coverall: Poly-coated/Paper Tyvek;
- o Steel-toe work boots with chemical-resistant overboots or disposable boot covers: Rubber;
- o Disposable inner gloves, surgical type;
- o Disposable outer gloves: Neoprene;
- o Supplied air-pressure demand SCBA or airline system with 5-minute egress bottle;
- o Hard hat; and,
- o All joints taped with duct tape.

NOTE:

Use of Level B personal protective equipment requires that two (2) persons must be available as backup ready to provide emergency assistance.

4.3 Level C Protection Shall Be Used When:

- o The same level of skin protection as Level B, but a lower level of respiratory protection is required;
- o The types of air contaminants have been identified, concentrations measured, and an air-purifying respirator is available that can remove contaminants;
- o The substance has adequate warning properties and all criteria for the use of APR respirators has been met; and,
- o 1 - 5 ppm of unknown organic vapors above background levels are anticipated.

4.3.1 Level C Protective Equipment at a Minimum Shall Consist of:

- o Chemical-resistant coveralls: Polycoated/Paper Tyvek;
- o Steel-toe work boots with chemical-resistant overboots or disposable boot covers: Rubber;
- o Disposable inner gloves, surgical type;
- o Disposable outer gloves: Neoprene/Solvex/Nitrile;
- o Full-face air purifying respirator (APR);
- o Chemical cartridge or canister type;
- o Hard hat; and,
- o All joints taped with duct tape;

Note:

Tyvek may be substituted as coveralls and surgical gloves as disposable outer gloves when only a dust contaminant is present.

4.4 Level D Protection Shall Be Used When:

- o The atmosphere contains no known hazard; and,
- o Work functions preclude splashes, immersion or the potential for unexpected inhalation of, or contact with, hazardous concentrations of harmful chemicals.

4.4.1 Level D Protection Equipment at a Minimum Shall Consist of:

- o Standard work uniform or coveralls;
- o Safety-toe work boots;
- o Gloves as needed;
- o Safety glasses;
- o Splash shield as needed; and,
- o Hard-hat.

4.5 Safety Equipment Which May Be Required For Specific Tasks:

- o Chemical-resistant aprons;
- o Acid suits;
- o Goggles;
- o Face shields;
- o Five-minute escape device;
- o Welders goggles or shields; and,
- o Hearing protection.

4.6 Activity Specific Levels of Protection:

The required level of protection is specific to the activity being conducted. At this site, the minimum levels of protection are as follows:

<u>Activity</u>	<u>Level of Protection</u>	<u>Special Requirements</u>
Site Preparation	D	Paper tyvek, gloves, and safety glasses are recommended
Drum Staging and Segregation	C	When handling drums that are empty
	B	When handling drums that contain material
Drum Overpacking	C	Level B should be used when overpacking drums that are extremely deteriorated
Excavation of Test Pits and Partially Buried Drums	C	Continuous air monitoring with HNu
	B	If hazardous material is discovered
Drum Sampling	B	None
Soil Sampling	C	None
Air Monitoring	C	Locations outside hot zone may be monitored in Level D
	B	If hazardous materials are discovered and during drum sampling

5.0 MEDICAL MONITORING REQUIREMENTS

Refer to Introduction for Site Entry Requirements.

6.0 AIR MONITORING AND ACTION LEVELS

According to 29 CFR 1910.120 (h) Air Monitoring shall be used to identify and quantify airborne levels of hazardous substances and health hazards in order to determine the appropriate level of employee protection needed on-site.

6.1 Routine Air Monitoring Requirements:

- o Upon initial entry to rule out IDLH conditions;
- o When the possibility of an IDLH condition or flammable atmosphere has developed;
- o When work begins on a different portion of the site;
- o Contaminants other than those previously identified are being handled;
- o A different type of operation is initiated;
- o Employees are handling leaking drums or containers or working in areas with obvious liquid contamination; and,
- o Continuously during confined space work.

Air monitoring will consist at a minimum of the criteria listed below. All air monitoring data will be documented and submitted to the OSC and available in the command post site files for review by all interested persons. Air monitoring instruments will be calibrated and maintained in accordance with the manufacturer's specifications.

6.2 Site Specific Air Monitoring Requirements:

Instrument	Compounds To Detect	Frequency	Comments/ Action Level
HNU-PID OVA	Organic vapors and gases	Periodically & as determined by OSC & Section 6.1 Continuously during test pit excavation	>5 ppm upgrade PPE for unknowns ~TLV upgrade to Level B for knowns >500 ppm upgrade to Level A
CGI/O ₂	Explosive/ flammable atmospheres	During test pit excavations	25 % LEL - operations cease and amelioratory actions investigated

7.0 SITE CONTROL AND STANDARD OPERATING PROCEDURES

7.1 Work Zones:

The primary purpose for site controls is to establish the hazardous area perimeter, to reduce migration of contaminants into clean areas, and to prevent access or exposure to hazardous materials by unauthorized persons. At the end of each workday, the site should be secured or guarded to prevent unauthorized entry. Site work zones will include:

7.1.1 Exclusion Zone:

The exclusion zone will be the "hot-zone" or contaminated area inside the site perimeter. Entry to and exit from this zone will be made through a designated point and all personnel will be required to sign the hot zone entry/exit log located at the decon area. Appropriate warning signs to identify the exclusion zone should be posted (i.e. "DANGER - AUTHORIZED PERSONNEL ONLY", "PROTECTIVE EQUIPMENT REQUIRED BEYOND THIS POINT", etc.) Exit from the exclusion zone must be accompanied by personnel and equipment decontamination as described in Section 8.0.

7.1.2 Decontamination Zone:

The decontamination zone will provide a location for removal of contaminated personal protective equipment and final decontamination of personnel and equipment. All personnel and equipment should exit only via the decon area. A separate decontamination area will be established for heavy equipment.

7.1.3 Clean Zone:

This uncontaminated support zone or clean zone will be the area outside the exclusion and decontamination zones and within the geographic perimeters of the site. This area is used for staging of materials, parking of vehicles, office and laboratory facilities, sanitation facilities, and receipt of deliveries. Personnel entering this zone may include delivery personnel, visitors, security guards, etc., who will not necessarily be permitted in the exclusion zone. There will be one controlled entry/exit point from the clean zone to the decontamination zone.

All personnel arriving in the support zone should, upon arrival, report to the command post and sign the site entry/exit log.

7.2 General Field Safety and Standard Operating Procedures:

- o The "buddy system" will be used at all times by all field personnel. No one is to perform field work alone. Maintain visual, voice or radio communication at all times.
- o Whenever possible, avoid contact with contaminated (or potentially contaminated) surfaces. Walk around (not through) puddles and discolored surfaces. Do not kneel on the ground or set equipment on the ground. Stay away from any waste drums unless necessary. Protect equipment from contact by bagging.
- o Eating, drinking, or smoking is permitted only in designated areas in the support zone.
- o Hands and face must be thoroughly washed upon leaving the work area and before eating, drinking, or any other activities.
- o Beards or other facial hair that interferes with respirator fit are prohibited.
- o All equipment must be decontaminated or discarded upon exit from the exclusion zone.

- o All personnel exiting the exclusion zone must go through the decontamination procedures described in Section 8.0.
- o Safety Equipment described in Section 4.0 will be required for all field personnel unless otherwise approved by the Site Health and Safety Officer.
- o Practice administrative hazard control for all site areas by restricting entrance to exclusion zones to essential personnel and by using operational SOPs.

8.0 DECONTAMINATION PROCEDURES

In general, everything that enters the exclusion zone at this site, must either be decontaminated or properly discarded upon exit from the exclusion zone. All personnel, including any state and local personnel must enter and exit the hot zone through the decon area. Prior to demobilization, contaminated equipment will be decontaminated and inspected by the OSC before it is moved into the clean zone. Water used in the equipment decontamination procedure will be allowed to stay on-site without containment.

All personnel must sign the "HOT ZONE ENTRY/EXIT LOG" when entering and exiting the exclusion zone.

8.1 Procedures for Equipment Decontamination:

Following decontamination and prior to exit from the hot zone, the OSC or a designated alternate, shall be responsible for insuring that the item has been sufficiently decontaminated. This inspection shall be included in the site log.

8.2 Procedure for Personnel Decontamination:

This decontamination procedure applies to personnel at this site wearing Level B and C protection. These are the minimum acceptable requirements:

Station 1: Segregated Equipment Drop

Deposit equipment used on-site (tools, sampling devices, monitoring instruments, radios, etc.) on plastic drop cloths. These items must be decontaminated or discarded as waste prior to removal from the exclusion zone.

Station 2: Outer Boot and Outer Glove Wash and Rinse

Scrub outer boots and outer gloves with decontamination solution or detergent water. Rinse off using large amounts of water.

Station 3: Outer Boot and Glove Removal

Remove outer boots and gloves. If outer boots are disposable, deposit in container with plastic liner. If non-disposable, store in a clean dry place.

Station 4: Outer Garment Removal

Remove chemical-resistant outer garments and deposit in container lined with plastic. Dispose of splash suits as necessary.

Station 5: Respiratory Protection Removal

Remove hard hat, face piece, and if applicable, deposit SCBA on plastic sheets. APR cartridges will be discarded as appropriate. Wash and rinse respirator at least daily. Wipe off SCBA and store in safe place.

Station 6: Inner Glove Removal

Remove inner gloves. Deposit in container for disposal.

Station 7: Field Wash

Thoroughly wash hands and face with soap and water. Shower as soon as possible.

NOTE: If a wet personnel decontamination procedure is deemed unnecessary, all protective clothing will simply be removed and bagged.

9.0 EMERGENCY RESPONSE PLAN

It is essential that site personnel be prepared in the event of an emergency. Emergencies can take many forms: illnesses or injuries, chemical exposure, fires, explosions, spills, leaks, releases of harmful contaminants, or sudden changes in the weather. The following sections outline the general procedures for emergencies. Emergency information will be available at the command post.

9.1 Emergency Contacts:

Fire: Central Ave (near Pershing Field) (201) 659-9386
Area dispatch: (201) 963-2400

Police: Jersey City (North Precinct) (201) 547-5350

Ambulance: Amb-U-Car (275 New York Ave.) (201) 656-8888

Hospitals: Christ Hospital (CH)

176 Palisade Avenue, Jersey City, New Jersey 07306

(201) 795-8200 - General Information

(201) 795-8280 - Emergency Room

Chemical Trauma Capabilities? No

Jersey City Medical Center (JCMC)

50 Baldwin Avenue, Jersey City, New Jersey 07304

(201) 915-2000 - General Information

(201) 915-2200 - Emergency Room

Chemical Trauma Capabilities? Yes

Poison Control Center: 1-800-962-1253

Directions from Site to Hospitals (See Maps in Attachment B):

(CH) - West on New York Avenue to Ravine Avenue (first cross-street). Right on Ravine Avenue for 1 block. Right on Palisade Avenue, and continue for 7 blocks. Hospital on left-hand side.

(JCMC) - West on New York Avenue to Ravine Avenue (first cross-street). Right on Ravine Avenue for 1 block. Right on Palisade Avenue, and continue for approximately 14 blocks. Right onto Newark Avenue, two blocks to Baldwin Ave. Left on Baldwin to Montgomery Street. Hospital on left-hand side.

NOTE: Maps and directions to the hospital will be posted by the EPA and TAT Vehicles.

The route to Christ Hospital was verified by Peter Di Pasca on February 16, 1989. Distance from site to hospital is one-half mile. Approximate driving time is 5 minutes.

The route to Jersey City Medical Center was verified by Peter Di Pasca on May 7, 1991. Distance from site to hospital is 2.1 miles. Approximate driving time is 10 minutes.

The fire, police, and hospitals were notified of site operations by Peter Di Pasca and Daniel Harkay on May 7, 1991.

The following individuals have been trained in CPR and First Aid:
Daniel Harkay Peter Di Pasca

9.2 Additional Emergency Numbers:

Chemtrec	(800)-424-9300
TSCA Hotline	(800)-424-9065
	(202) 544-1401
ATSDR	(404) 329-3311 (Day)
	(404) 639-0615 (Night)
AT & F (Explosives Info.)	(800) 424-9555
National Response Center	(800) 424-8802
Weston Medical Emergency Service	(513) 421-3063
Weston 24-Hour Hotline	(215) 524-1925 or 1926
Pesticide Information Service	(800) 845-7633
EPA ERT Emergency	(201) 321-6660
RCRA Hotline	(800) 424-9346
CMA Chemical Referral Center	(800) 262-8200
National Poison Control Center	(800) 942-5969
U.S. DOT	(202) 366-0656 (Day only)
	(202) 426-2075 (Hotline)
Weston TAT Office	(201) 225-6116
TAT ZPMO	(215) 524-1160
U.S. EPA Region II R&P Branch Hotline	(201) 548-8730
City of Jersey City -	(201) 547-6848
Division of Engineering	(201) 547-5562
John McDonald, Environmental Specialist, Jersey City Division of Engineering	(201) 662-3642 (Pager)
Jersey City Incinerator Authority	(201) 432-4645

9.3 EMERGENCY EQUIPMENT AVAILABLE ON-SITE

Communications Equipment

Location

Public Telephones:	Palisade Avenue, 2 blocks away
Private Telephones:	Next-Door to Site on East side
Mobile Telephones:	In ERCS and TAT Vehicles
Two-Way Radios:	In TAT Vehicle

Medical Equipment

First Aid Kits:	In ERCS and TAT Vehicles	
Inspection:	Monthly	By: ERCS and TAT Personnel
Stretcher/Backboard:	N/A	
Eye Wash Station:	N/A	
Oxygen:	N/A	
Safety Shower:	Water Will Be Available On-site	

Fire-Fighting Equipment

Fire Extinguishers:	In EPA, TAT and ERCS Vehicles	
Inspection:	Monthly	By: EPA, TAT and ERCS Personnel

9.4 Project Personnel Responsibilities During Emergencies:

ON-SCENE COORDINATOR (OSC)

As the administrator of the project, the OSC has primary responsibility for responding to and correcting emergency situations. The OSC must:

- o Take appropriate measures to protect personnel including: withdrawal from the exclusion zone, upgrading or downgrading the level of protective clothing and

respiratory protection, or total evacuation and securing of the site.

- o Take appropriate measures to protect the public and the environment, including isolating and securing the site, preventing runoff to surface waters and ending or controlling the emergency to the extent possible.
- o Ensure that appropriate Federal, State and local agencies are informed, and emergency response plans are coordinated. In the event of fire or explosion, the local fire department should be summoned immediately. In the event of an air release of toxic materials, the local authorities should be informed in order to assess the need for evacuation. In the event of a spill, sanitary districts and drinking water systems may need to be alerted.
- o Ensure that appropriate treatment or testing for exposed or injured personnel is obtained;
- o Determine the cause of the incident and make recommendations to prevent the recurrence; and,
- o Ensure that all required reports have been prepared.

RESPONSE MANAGER (RM)

The RM must immediately report emergency situations to the OSC, take appropriate measures to protect site personnel and assist the OSC as necessary in responding to and mitigating the emergency situation.

TECHNICAL ASSISTANCE TEAM (TAT)

The TAT Representative must immediately report emergency situations to the OSC, take appropriate measures to protect site personnel and assist the OSC as necessary.

9.5 Medical Emergencies:

Any person who becomes ill or injured in the exclusion zone must be decontaminated to the maximum extent possible. If the injury or illness is minor, full decontamination should be completed and first aid administered prior to transport. If the patient's condition is serious, at least partial decontamination should be completed (i.e., complete disrobing of the victim and redressing in clean coveralls or wrapping in a blanket.) First aid should be administered while awaiting an ambulance or paramedics. All injuries and illnesses must immediately be reported to the OSC.

Any person being transported to a clinic or hospital for treatment should take with them information on the chemical(s) they have been exposed to at the site. This information is included in Table 2.3.

Any vehicle used to transport contaminated personnel will be tested and cleaned as necessary.

9.6 Fire or Explosion:

In the event of a fire or explosion, the local fire department should be summoned immediately. Upon their arrival, the OSC or designated alternate will advise the fire commander of the location, nature and identification of the hazardous materials on-site.

If it is safe to do so, site personnel may:

- o Use fire fighting equipment available on site to control or extinguish the fire; and,
- o Remove or isolate flammable or other hazardous materials which may contribute to the fire.

9.7 Spill or Leaks:

Spill prevention and response procedures will be used to prevent additional spillage at the site and to mitigate existing discharges. Spill Prevention Control and Countermeasures (SPCC) procedures are generally defined in 40 CFR 112 and the analogous NJDEP regulations (DPCC and DCP).

Potentially hazardous spill situations will be reduced by supplying containment devices and materials in work areas. If site conditions are suitable, earthen berms will be constructed around specific areas. If site conditions are not suitable, or the potential spill is on a smaller scale, barriers will be constructed with sorbent materials such as "speedi-dry" and/or sorbent booms. Dikes and berms will also be used to divert run-on and run-off from critical zones.

Since a spill cleanup process must be conducted under crisis conditions, it is important that the methods used for dealing with a spill be considered beforehand. However, steps used in this procedure must be flexible because no two emergencies are exactly the same. Alternative steps must be available if problems should

arise in a given cleanup operation. Factors to be assessed in the event of a spill include:

- o Volume of hazardous substance released and the rate of release;
- o Nature of the spill area and spill material;
- o Dangers existing to personnel in the immediate area;
- o Nature of damage and possibilities of repair;
- o The possibility of transferring the material to an alternate container;
- o Feasibility of construction of a containment dike;
- o The potential for the spilled substance to reach surface waters or a sewer;
- o Danger of explosion or fire;
- o Equipment and supplies necessary to confine the substance and complete treatment.

In most cases, the success of a cleanup operation is dependent upon the time needed to contain the spill. Therefore, the first attempt at spill containment will be at the point of discharge. This can often be accomplished by closing valves, reinforcing or repairing damaged containers, moving or changing the position of fallen or ruptured containers, or emptying the container by pumping to a temporary storage or holding vessel.

Spill response will follow existing ERCS procedures and organizational protocol. Pumps, suction hoses and containers will be available to recover spilled materials when directed to do so by the Supervisor.

Handling and transport of drummed waste shall be conducted in a controlled and safe manner which will minimize damage to structurally sound drums, repacks and overpacks. If leakage or spillage of waste occurs during transport or handling, the drum shall immediately be placed within an overpack drums. Overpack drums shall be provided at each staging area and at areas of existing drums.

In the event of a spill, the drum handling team shall immediately contact their Supervisor who will have all personnel evacuated from the immediate spill area. Personnel trained in spill response procedures shall isolate and contain the spill. Where possible, spilled waste material shall be collected and placed in repack containers for ultimate disposal. Following containment and

collection of spilled waste, the area shall be surveyed by the Safety Officer and declared safe prior to reentry of work teams.

Task/Work Area	Potential Spill or Discharge	Equipment, Materials and Methods for Cleanup
Excavation of Partially Buried Drums / Entire Site	Accidental rupture during movement of rusted or damaged drums	Sorbent pads, booms, speedi-dry, pH neutralizers, shovels, brooms, overpack drums, DOT 17E and 17H drums, transfer pumps
Drum Overpacking / Entire Site	Spillage from drum or from accidentally dropping drum	Same as above

9.8 Evacuation Routes and Resources:

Evacuation routes have been established by work area locations for this site. The outside work area has been provided with two designated exit points:

1. Through the front gate to New York Avenue; and,
2. Down the southern slope to the railroad tracks.

Evacuation should be conducted immediately, without regard for equipment under conditions of extreme emergency.

- o Notification of emergency situations will be relayed to all personnel by verbal communication via radio or by the type of blast from an air horn:

One short blast: Spill or release, or employee is injured - report to decontamination zone;

One long blast: Explosion or fire - evacuate site via nearest escape route.

- o Keep upwind of smoke, vapors or spill location.
- o Exit through the decontamination corridor if possible.

- o If evacuation is not via the decontamination corridor, site personnel should remove contaminated clothing once they are in a location of safety and leave it near the exclusion zone or in a safe place.
- o The OSC will conduct a head count to insure all personnel have been evacuated safely.
- o In the event that emergency site evacuation is necessary, all personnel are to:
 - 1. escape the emergency situation;
 - 2. decontaminate to the maximum extent practical; and,
 - 3. meet at the command post.
- o In the event that the command post is no longer in a safe zone, meet **ON NEW YORK AVENUE UNDER THE RAVINE AVENUE OVERPASS.**

ATTACHMENT A
SITE SAFETY PLAN AMENDMENTS

SITE SAFETY PLAN AMENDMENT # _____:

SITE NAME: _____

DATE: _____

TYPE OF AMENDMENT: _____

REASON FOR AMENDMENT: _____

ALTERNATE SAFEGUARD PROCEDURES: _____

REQUIRED CHANGES IN PPE: _____

U.S. EPA HSO INFORMED: _____

ERCS CONTRACTOR HSO INFORMED: _____

TAT RSO INFORMED: _____

ATTACHMENT B

MAPS



SPILL PREVENTION &
EMERGENCY RESPONSE DIVISION

EPA PM

D. HARKAY

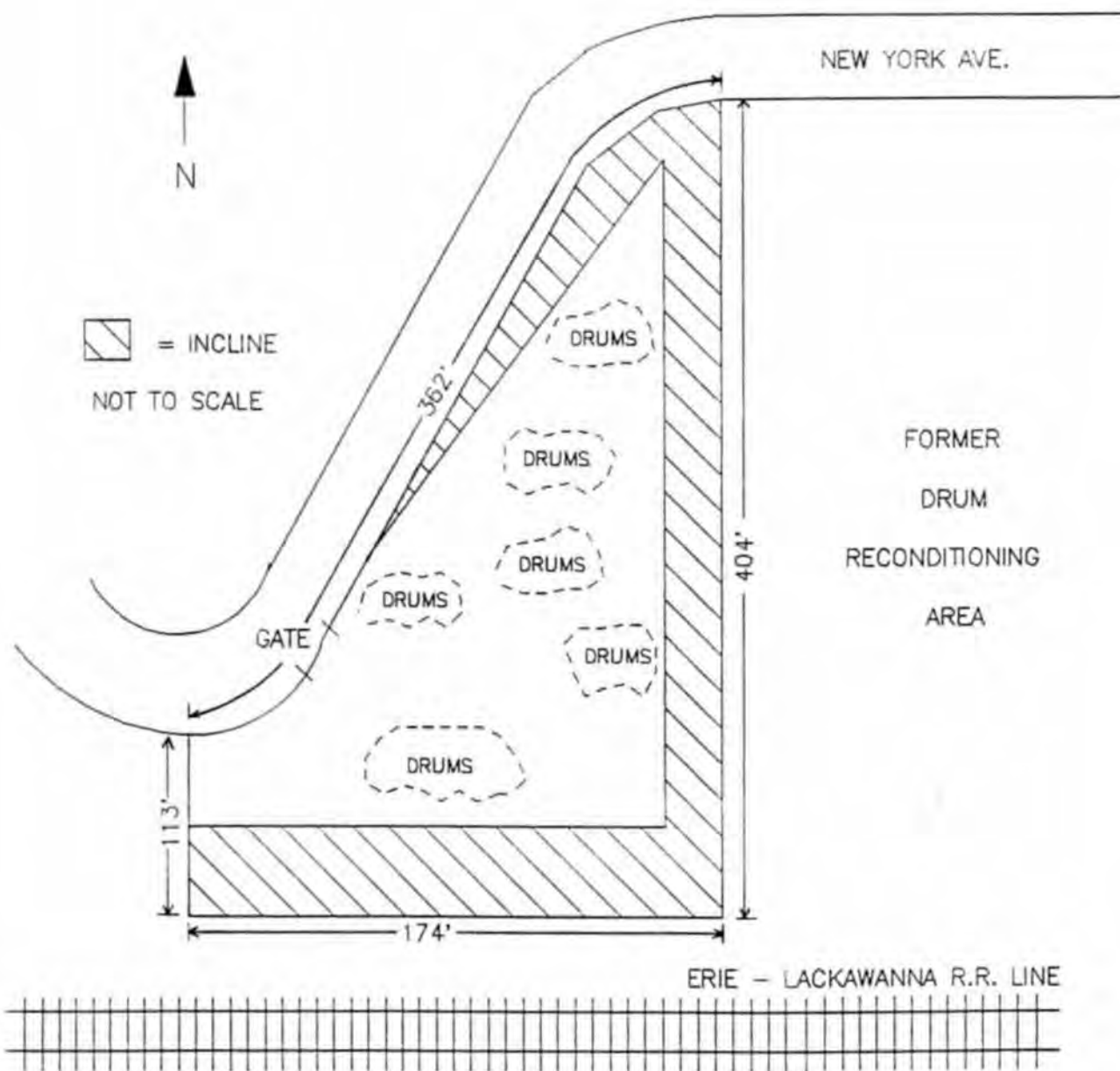
LOCATION MAP

In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.

TAT PM

P. DI PASCA

IDEAL COOPERAGE SITE
JERSEY CITY, NJ



SPILL PREVENTION &
EMERGENCY RESPONSE

EPA PM

D. HARKAY

SITE MAP

In Association with ICF Technology Inc., C.C. Johnson &
Malhotra, P.C., Resource Applications, Inc. and
R.E. Sarriera Associates

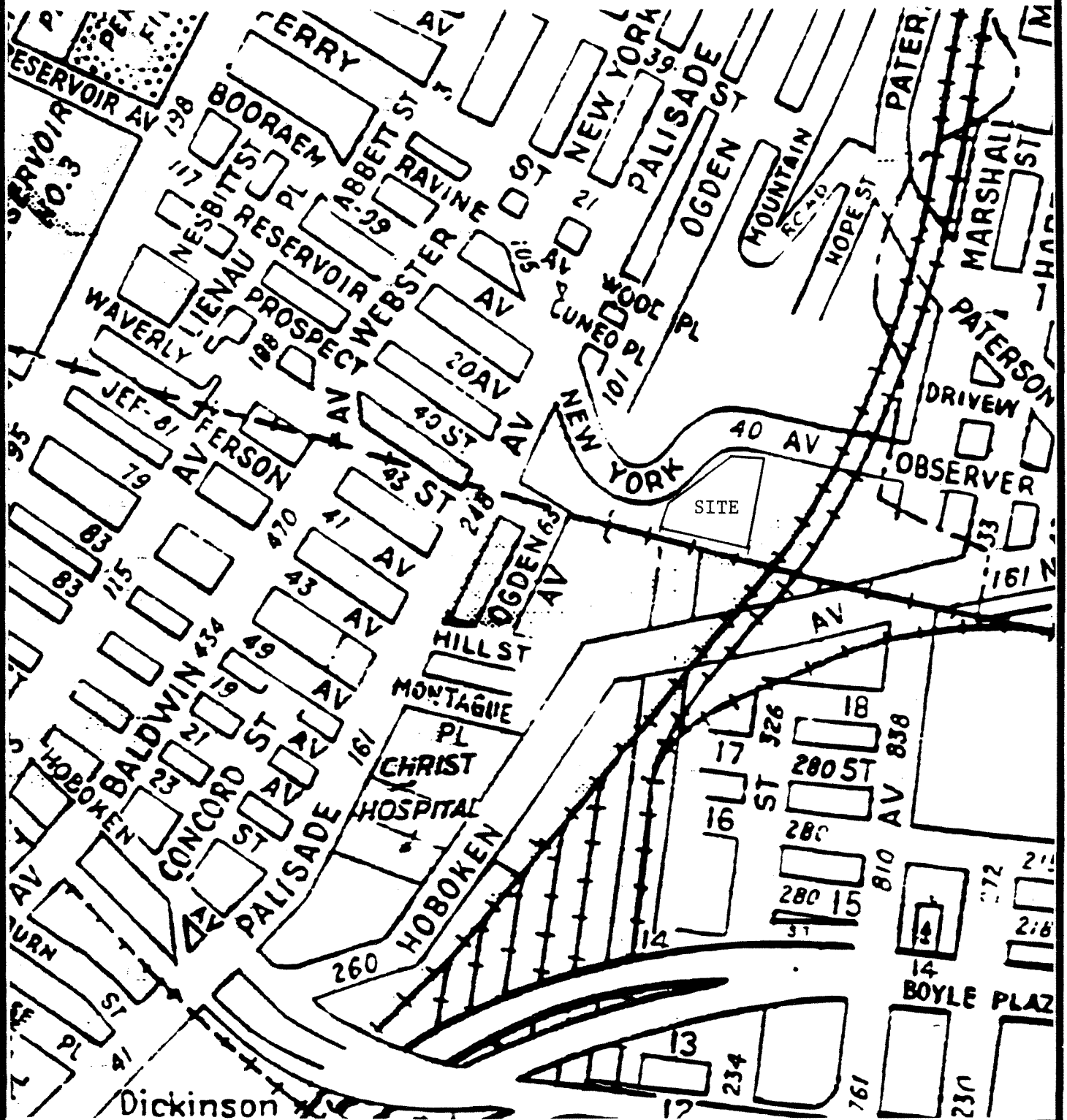
TAT PM

P. DI PASCA

IDEAL COOPERAGE SITE
JERSEY CITY, NJ

Directions from Site to Christ Hospital (CH)

West on New York Avenue to Ravine Avenue (first cross-street). Right on Ravine Avenue for 1 block. Right on Palisade Avenue, and continue for 7 blocks. Hospital is on the left-hand side.



Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

In Association with ICF Technology Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc. and R.E. Sarriera Associates

EPA PM

D. HARKAY

ROUTE TO
CHRIST HOSPITAL

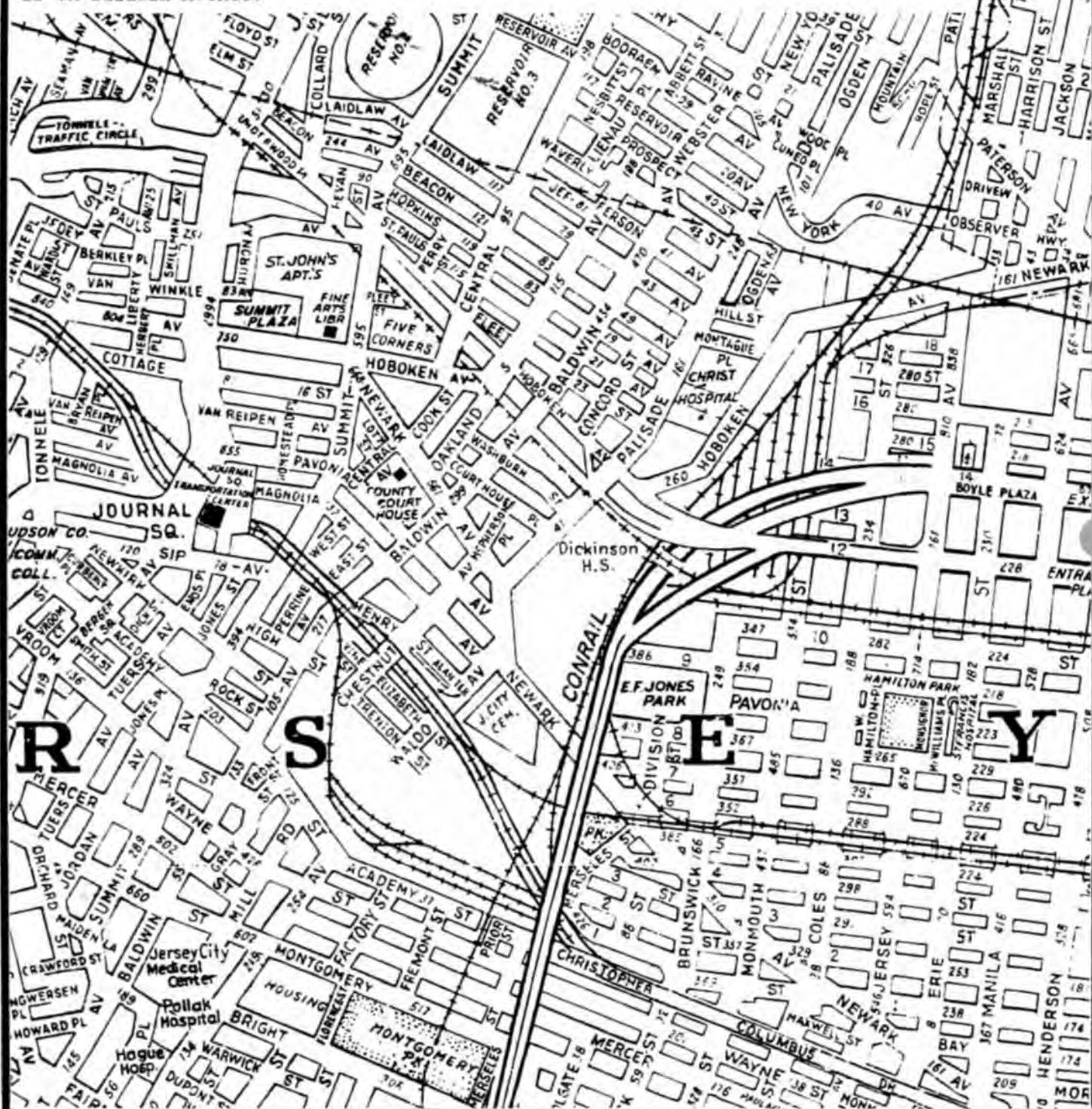
TAT PM

P. DI PASCA

IDEAL COOPERAGE SITE
JERSEY CITY, NJ

Directions from Site to Jersey City Medical Center (JCRC):

West on New York Avenue to Ravine Street (first cross-street). Right on Ravine Street for 1 block. Right on Palisade Avenue, continue for approximately 14 blocks to "T" intersection, turn right onto Newark Avenue and a quick left onto Chestnut Avenue (first side street). Make first right onto Pavonia Avenue, continue two blocks, and turn left onto Summit Avenue. Proceed south for approximately 6 blocks and turn left onto Academy Street. Go 1 block and turn right onto Baldwin Avenue. Hospital is at intersection of Baldwin Avenue and Montgomery Street. E/R entrance is on Baldwin Avenue.



WESTON

Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

In Association with ICF Technology Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc. and R.E. Sarriera Associates

EPA PM D. HARKAY

TAT PM P. DI PASCA

ROUTE TO JERSEY CITY MEDICAL CENTER

IDEAL COOPERAGE SITE JERSEY CITY, NJ

ATTACHMENT C

HEAT STRESS

HEAT STRESS

EFFECTS OF HEAT STRESS

If the body's physiological processes fail to maintain a normal body temperature because of excessive heat, a number of physical reactions can occur ranging from mild (such as fatigue, irritability, anxiety, and decreased concentration, dexterity, movement) to fatal. Standard reference books should be consulted for specific treatment.

HEAT-RELATED PROBLEMS

Heat Rash

Heat rash is caused by continuous exposure to heat and humid air and aggravated by chafing clothes. Heat rash also decreases the ability to tolerate heat as well as being a nuisance.

Heat Cramps

Heat cramps usually affect people who work in hot environments and perspire a great deal. Loss of salt from the body causes very painful cramps of the leg and abdominal muscles. Heat cramps may also result from drinking iced water or other drinks either too quickly or in too large a quantity. The symptoms of heat cramps are as follows:

- * Muscle cramps in legs and abdomen
- * Pain accompanying cramps
- * Faintness
- * Profuse perspiration

To provide emergency care for heat cramps, remove the patient to a cool place. Give him sips of liquids such as "Gatorade" or its equivalent. Apply manual pressure to the cramped muscle. Remove the patient to a hospital if there is any indication of a more serious problem.

Heat Exhaustion

Heat exhaustion occurs in individuals working in hot environments. This disorder may be associated with heat cramps. It is brought about by the pooling of blood in the vessels of the skin. The heat is transported from the interior of the body to the surface by the blood. The skin vessels become dilated and a large amount of blood is pooled in the skin. This condition, plus the blood pooled in the lower extremities when in an upright position, may lead to an

inadequate return of blood to the heart and eventually to physical collapse. The symptoms of heat exhaustion are:

- * Weak pulse
- * Rapid and usually shallow breathing
- * Generalized weakness
- * Pale, clammy skin
- * Profuse perspiration
- * Dizziness
- * Unconsciousness
- * Appearance of having fainted (the patient responds to the same treatment administered in cases of fainting).

To provide emergency care of heat exhaustion, remove the patient to a cool place and remove as much clothing as possible. Administer cool water, "Gatorade" or its equivalent. If possible, fan the patient continually to remove heat by convection, but do not allow chilling or overcooling. Treat the patient for shock, and remove him to a medical facility if there is any indication of a more serious problem.

Heat Stroke

Heat stroke is a profound disturbance of the heat-regulating mechanism, associated with high fever and collapse. Sometimes this condition results in convulsions, unconsciousness and even death. Direct exposure to sun, poor air circulation, poor physical condition, and advanced age (over forty) bear directly on the tendency to heat stroke. It is a serious threat to life and carries a twenty percent mortality rate. Alcoholics are extremely susceptible. The symptoms of heat stroke are:

- * Sudden onset
- * Dry, hot and flushed skin
- * Dilated pupils
- * Early loss of consciousness
- * Full and fast pulse
- * Breathing deep at first, later shallow and even almost absent.

- * Muscle twitching, growing into convulsions.
- * Body temperature reaching 105 to 106 degrees or higher.

When providing emergency care for heat stroke, remember that this is a true emergency. Transportation to a medical facility should not be delayed. Remove the patient to a cool environment if possible, and remove as much clothing as possible. Assure an open airway. Reduce body temperature promptly by dousing the body with water, or preferably by wrapping in a wet sheet. If cold packs are available place them under the arms, around the neck, at the ankles, or any place where blood vessels that lie close to the skin can be cooled. Protect the patient from injury during convulsions, especially from tongue biting.

HEAT STRESS MONITORING

All supervisors should ensure that their personnel are briefed on the hazards, symptoms, and treatment of heat related problems. For monitoring the body's recuperative ability to excess heat, one or more of the following techniques should be used as a screening mechanism. Monitoring of personnel wearing impervious clothing should commence when the ambient temperature is 70°F or above. Frequency of monitoring should increase as the ambient temperature increases or as slow recovery rates are indicated. When temperatures exceed 85°F, workers should be monitored for heat stress after every work period.

1. Heart rate (HR) should be measured by the radial pulse for 30 seconds as early as possible in the resting period. The HR at the beginning of the rest period should not exceed 110 beats per minute. If the HR is higher, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest period stays the same. If the pulse rate is 100 beats per minute at the beginning of the next rest period, the following work cycle should be shortened by 33%.
2. Body temperature should be measured orally with a clinical thermometer as early as possible in the resting period. Oral temperature (OT) at the beginning of the rest period should not exceed 99°F. If it does, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest period stays the same. However, if the OT exceeds 99.7°F at the beginning of the next period, the following work cycle should be further shortened by 33%. OT should be measured again at the end of the rest period to make sure that it has dropped below 99°F.
3. Body water loss (BWL) due to sweating should be measured by weighing the worker in the morning and in the evening. The clothing worn should be similar at both weighings;

preferably the workers should be nude. The scale should be accurate to plus or minus 1/4 lb. BWL should not exceed 1.5% of the total body weight. If it does, the worker should be instructed to increase his daily intake of fluids by the weight lost. Ideally, body fluids should be maintained at a constant level during the work day. This requires replacement of salt lost in sweat as well.

4. Good hygienic standards must be maintained by frequent change of clothing and daily showering. Clothing should be permitted to dry during rest periods. Persons who notice skin problems should immediately consult medical personnel.

PERSONNEL MONITORING FOR HEAT STRESS

The Site Safety Officer or Response Manager will administer the following heat stress monitoring schedule required for those individuals performing CONTINUOUS work under the conditions listed below. The individual performing the monitoring will be familiar with the symptoms and first aid procedures for heat stress. Employees will be encouraged to monitor signs of heat stress among fellow employees via the "buddy system" when working in Levels B or C in temperatures above 85°F. The Site Safety Officer, Response Manager, or On-Scene Coordinator should be contacted immediately upon the notice of any signs of heat stress in fellow employees. Fluids will be made available to all workers during work breaks.

Individuals working in Level A will be monitored for heat stress during every work break and immediately upon PPE removal.

Temperature (°F)	Monitoring Frequency	
	Level D	Level B or C
>90	Every 45 mins	Every 20 mins
85-90	Every 60 mins	Every 30 mins
80-90	Every 90 mins	Every 60 mins
75-80	Every 120 mins	Every 90 mins

SIGNS AND SYMPTOMS OF HEAT STRESS

Heat Cramps

Caused by heavy sweating without electrolyte replacement. Signs and symptoms include muscle spasms and pain in the hands, feet, and abdomen.

Heat Exhaustion

Caused by increased cardiovascular stress or dehydration. Signs and symptoms include pale, cool, moist skin; heavy sweating; dizziness; nausea; and vomiting.

Heat Stroke

Failure of temperature regulation in the body. Most serious form of heat stress. Competent medical help required. Signs and symptoms include red, hot, dry skin; reduced perspiration; nausea, dizziness or confusion; strong, rapid pulse; or coma.

ATTACHMENT D
CHEMICAL HAZARD INFORMATION
(MATERIAL SAFETY DATA SHEETS)

**Genium Publishing Corporation**

1145 Catalyn Street
Schenectady, NY 12303-1836 USA
(518) 377-8854

Material Safety Data Sheets Collection:

Sheet No. 327
Acetic Acid, Glacial

Issued: 12/80 Revision: D, 8/89

Section 1. Material Identification

Acetic Acid, Glacial, Description:

Obtained in the destructive distillation of wood; or from acetylene and water via acetaldehyde by oxidation with air. Used widely in the chemical process industry to make acetates, plastics and rubber, acetyl compounds, and in cellulose acetate; as a food additive (vinegar), natural latex coagulant, and in textile printing.

Other Designations:

Ethanoic acid; methane carboxylic acid; CH₃COOH; CAS No. 0064-19-7.

Manufacturer:

Contact your supplier or distributor. Consult the latest *Chemicalweek Buyers' Guide* (Genium ref. 73) for a suppliers list.

Comments:

Glacial acetic acid is the undiluted acid which is a minimum of 99.8% pure acetic acid by weight. Aqueous solutions of acetic acid are usually of much lower concentration; however, you should always ascertain the strength of any aqueous acetic acid you buy from a supplier or distributor. No. 327A, Acetic Acid (28%), is being removed from the *MSDS Collection*.

R 1

I 4

S 4

K 2

2

2

1

-

NFPA

HMIS

H 2

F 2

R 1

PPG*

* Sec. 8

Section 2. Ingredients and Occupational Exposure Limits

Acetic acid, ca 100%

OSHA PELs

8-hr TWA: 10 ppm, 25 mg/m³

15-min STEL: 15 ppm, 37 mg/m³

ACGIH TLVs, 1988-89

TLV-TWA: 10 ppm, 25 mg/m³

TLV-STEL: 15 ppm, 37 mg/m³

NIOSH REL

None established

Toxicity Data*

Human, oral, TD₀₁: 1470 µg/kg

Human, inhalation, TC₀₁: 816 ppm/3 min

Rat, oral, LD₅₀: 3310 mg/kg

* See NIOSH, RTECS (AF1225000), for additional toxicity data with references to irritative, mutagenic, and reproductive effects.

Section 3. Physical Data

Boiling Point: 244 °F (118 °C)

Melting Point: 62 °F (16.6 °C)

Vapor Pressure: 14.8 torr at 77 °F (25 °C)

Vapor Density (Air = 1): 2.07

Molecular Weight: 60 g/mol

Specific Gravity (H₂O = 1): 1.0492 at 68 °F (20 °C)

Water Solubility: Miscible*

pH: <7 (Acidic)

% Volatile by Volume: 100%

Appearance and Odor: A clear, colorless, mobile liquid; a sharp, characteristic, pungent vinegar-like odor perceptible (unfatigued) at airborne concentrations above 1 ppm.

* Acetic acid is also miscible with alcohol, glycerin, and ether; it is insoluble in carbon disulfide. Glacial acetic acid is hygroscopic (moisture absorbent, even from the air).

Section 4. Fire and Explosion Data

Flash Point: 112 °F (4.5 °C) TCC*

Autoignition Temperature: 800 °F (427 °C)

LEL: 5.4% v/v

UEL: 16% v/v

Extinguishing Media: Use water fog, dry chemical, alcohol foam, or carbon dioxide (CO₂) to put out acetic acid fires. Use water sprays to cool fire-exposed containers, flush unignited acetic acid away from heat or ignition sources, disperse vapors, and dilute spills to nonflammable mixtures. **Unusual Fire or Explosion Hazards:** Acetic acid, especially in combination with water, can attack certain metals and liberate extremely flammable and explosive hydrogen gas. If this occurs, direct fire-fighting techniques at the evolved hydrogen gas (H₂). **Special Fire-fighting Procedures:** Wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in the pressure-demand or positive-pressure mode.

* 103 °F (39 °C) CC.

Section 5. Reactivity Data

Stability/Polymerization: Acetic acid is stable at room temperature during routine operations. Hazardous polymerization cannot occur.

Chemical Incompatibilities: Acetic acid can react violently with strong oxidizing agents, ammonium nitrate, phosphorus trichloride, potassium hydroxide and other alkaline materials. Nitric or chromic acid can explode if mixed and heated with acetic acid. Mixing acetic acid with chlorosulfonic acid, 2-aminoethanol, oleum, or ethylene diamine in a closed container can increase the temperature and pressure inside that container.

Conditions to Avoid: Prevent exposures to temperature extremes, and to ignition sources such as open flame, uninsulated heating elements, electrical or mechanical sparks, etc. **Hazardous Products of Decomposition:** Thermal oxidative degradation of acetic acid is likely to produce carbon dioxide and toxic carbon monoxide (CO).

Section 6. Health Hazard Data

Carcinogenicity: Neither the NTP, IARC, nor OSHA lists acetic acid as a carcinogen. **Summary of Risks:** Inhalation of acetic acid at airborne concentrations greater than 50 ppm results in intolerable irritation to the eyes, nose, throat, and lungs. Inhalation can result in bronchospasms (wheezing) and shortness of breath. Repeated inhalation exposures to acetic acid can cause congestion of the pharynx. Skin contact with concentrated acetic acid can produce deep burns with destruction of tissue. The severity of skin damage depends on the acetic acid solution's strength; naturally, the more diluted, weaker acetic acid solutions are less hazardous. High vapor concentrations can blacken the skin, produce skin sensitization and conjunctivitis, and erode teeth. Eye contact causes immediate burns and pain. Ingestion is unlikely since the odor is ex-

Continue on next page

Continue on next page

Section 6. Health Hazard Data (continued)

remely irritating; however, if it does occur one might encounter the following symptomology: severe corrosion of the mouth and GI tract, vomiting, diarrhea, hematemesis (vomiting blood), circulatory collapse, uremia, and (possibly) death. **Medical Conditions Aggravated by Long-Term Exposure:** None reported. **Target Organs:** Skin, eyes, respiratory system, and teeth. **Primary Entry:** Inhalation, skin contact. **Acute Effects:** Irritation of the skin, eyes, and respiratory system are likely following occupational exposure to acetic acid. Corrosive, acidic tissue damage can occur depending on the exposure's nature and the acetic acid's strength. **Chronic Effects:** Erosion of tooth enamel.

FIRST AID

Eyes: Flush immediately, including under the eyelids, gently but thoroughly with flooding amounts of running water for at least 15 min. Speedily diluting and rinsing with water are absolutely vital to prevent permanent eye damage. All eye exposures should have further medical evaluation. **Skin:** After rinsing affected area with flooding amounts of water, wash it with soap and water. Treatment for acidic chemical burns may be required. **Inhalation:** Remove exposed person to fresh air and support breathing as needed. Have qualified medical personnel administer oxygen as required. **Ingestion:** Unlikely. If ingested, have the exposed person drink 3 to 4 glasses of water to dilute the acetic acid. Never induce vomiting; if it occurs spontaneously, give the victim more fluids. Never give anything by mouth to an unconscious person. **After first aid, get appropriate in-plant, paramedic, or community medical attention and support.** Seek prompt medical assistance for further observation and treatment.

Section 7. Spill, Leak, and Disposal Procedures

Spill/Leak: *Design and practice an acetic acid spill control and countermeasure plan (SCCP).* When a spill occurs, notify safety personnel, eliminate heat or ignition sources, provide optimum explosion-proof ventilation, and evacuate unnecessary personnel. Cleanup personnel must wear proper personal protective equipment (Sec. 8) to prevent skin contact or vapor inhalation. Use nonsparking tools and equipment to contain the spilled material. Never flush it to sewers, surface waters, waterways, or watersheds. Neutralize minor leaks or spills with soda ash or lime. **Disposal:** Contact your supplier or a licensed contractor for detailed recommendations. Follow applicable Federal, state, and local regulations.

OSHA Designations

Listed as an Air Contaminant (29 CFR 1910.1000, Subpart Z)

EPA Designations

RCRA Hazardous Waste (40 CFR 261.33): Not listed

Listed as a CERCLA Hazardous Substance* (40 CFR 302.4), Reportable Quantity (RQ): 5000 lb (2270 kg) [* per CWA, Sec. 311(b)(4)]

SARA Extremely Hazardous Substance (40 CFR 355): Not listed

SARA Toxic Chemical (40 CFR 372.65): Not listed

Section 8. Special Protection Data

Goggles: Wear protective eyeglasses or chemical safety goggles, per OSHA eye- and face-protection regulations (29 CFR 1910.133). Where splashing is possible, wear a full face shield. **Respirator:** Wear a NIOSH-approved respirator suitable for organic acid vapors. Follow OSHA respirator regulations (29 CFR 1910.134). For emergency or nonroutine operations (spills or cleaning reactor vessels and storage tanks), wear an SCBA. **Warning:** Air-purifying respirators do *not* protect workers in oxygen-deficient atmospheres. **Other:** Wear impervious and acid-resistant gloves, boots, aprons, and gauntlets to prevent prolonged or repeated skin contact. **Ventilation:** Provide general and local explosion-proof ventilation systems to maintain airborne concentrations below the OSHA PEL standards (Sec. 2). Local exhaust ventilation is preferred since it prevents contaminant dispersion into the work area by eliminating it at its source (Genium ref. 103). Ventilation ductwork must resist chemical attack by the acetic acid vapors. **Safety Stations:** Make available in the work area emergency eyewash stations, safety/quick-drench showers, and washing facilities. **Contaminated Equipment:** Never wear contact lenses in the work area; soft lenses may absorb, and all lenses concentrate, irritants. Launder contaminated clothing before wearing. Remove this material from your shoes and equipment. **Comments:** Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, using the toilet, or applying cosmetics.

Section 9. Special Precautions and Comments

Storage Requirements: Store acetic acid in closed, moisture-proof containers in a cool, dry, well-ventilated area with acid-resistant floors and controlled drainage away from incompatible chemicals (Sec. 5) and heat or ignition sources. Protect these containers from physical damage. This material may be stored with combustible organic solvents.* **Special Handling/Storage:** Isolated, remote, or outside storage is recommended for large quantities of acetic acid. Suitable materials for storage facilities include type 316 stainless steel, glass, and polyethylene. **Engineering Controls:** Prevent glacial acetic acid from freezing since the resulting expansion may burst pipes and/or storage containers. **Other Precautions:** Never add water to concentrated acetic acid; the dissolving reaction produces excess heat the acetic acid cannot absorb. Consequently, boiling and splattering incidents are possible. Instead, add the acetic acid to the water so the water can absorb the released heat and prevent boiling/splattering.

Transportation Data (49 CFR 172.101-2)

DOT Shipping Name: Acetic acid, aqueous solution, *or* Acetic acid, glacial

DOT Hazard Class: Corrosive material (both)

DOT ID No.: UN2790 (Aqueous solution), *or* UN2789 (Glacial)

DOT Label: Corrosive (both)

DOT Packaging Requirements: 49 CFR 173.245 (both)

DOT Packaging Exceptions: 49 CFR 173.244 (both)

IMO Shipping Name: Acetic acid († *or* ‡)

IMO Hazard Class: 8 (both)

IMO Label: Corrosive and flammable liquid (†), *or* Corrosive (‡)

IMDG Packaging Group: II (†), *or* II/III (†)

* *Safe Storage of Laboratory Chemicals*, Wiley, 1984.

† Defined as glacial acetic acid or acetic acid solution containing >80% acid by weight.

‡ Defined as acetic acid solution containing between 25% and 80% acid by weight.

MSDS Collection References: 1, 6, 7, 84-94, 100, 116, 117, 119, 120, 122

Prepared by: PJ Igoe, BS; **Industrial Hygiene Review:** DJ Wilson, CIH; **Medical Review:** MJ Hardies, MD

F5

Material Safety Data Sheet

Genium Publishing Corporation
1145 Catalyn Street
Schenectady, NY 12303-1836 USA
(518) 377-8855



No. 302
METHYL n-AMYL KETONE
(Revision C)

Issued: September 1979
Revised: March 1986

SECTION 1. MATERIAL IDENTIFICATION

20

MATERIAL NAME: METHYL n-AMYL KETONE

OTHER DESIGNATIONS: 2-Heptanone, n-Amyl Methyl Ketone, Methyl Pentyl Ketone, $\text{CH}_3\text{CO}(\text{CH}_2)_4\text{CH}_3$,
CAS #0110-43-0

MANUFACTURER/SUPPLIER: Available from several suppliers, including:
Ashland Chemical Co., Industrial Chemicals & Solvents Div., PO Box 2219,
Columbus OH 43216; Telephone: (614) 889-3844
Union Oil Co. of California, Union Chemical Div., 19005 Golf Rd.,
Schaumburg, IL 60103; Telephone: (312) 490-2500

HMIS

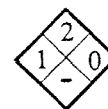
H: 1

F: 2

R: 1

PPE*

*See sect. 8



SECTION 2. INGREDIENTS AND HAZARDS

%

HAZARD DATA

Methyl n-Amyl Ketone ($\text{C}_7\text{H}_{14}\text{O}$)

ca 100

8-hr TWA 100 ppm*
or 465 mg/m^3

Rat, Oral, LD₅₀: 1.67 g/kg

Rabbit, Skin, LD₅₀: 12.6 g/kg

* Current OSHA PEL. NIOSH (1978) recommended a 10-hr TWA of 100 ppm
with an action level of 50 ppm; ACGIH (1985-86) TWA is 50 ppm or
235 mg/m^3 .

Rat, Inhalation, LCLo:
4000 ppm/4 hrs.

SECTION 3. PHYSICAL DATA

Boiling Point, 1 atm ... 304°F (151°C)

Vapor Pressure @ 20°C, mm Hg ... 2.6

Vapor Density (Air = 1) ... 3.9

Solubility in Water @ 20°C, wt. % ... 0.43

Specific Gravity 15/4°C ... 0.82

Evaporation Rate (BuAc = 1) ... 0.4

Melting Point ... -31°F (-35°C)

Molecular Weight ... 114.21

Appearance and odor: Clear, colorless liquid with fruity, bananalike odor. Good warning properties.

SECTION 4. FIRE AND EXPLOSION DATA

LOWER

UPPER

Flash Point and Method

Autoignition Temp.

Flammability Limits In Air

120°F (49°C) Open Cup

991°F (532°C)

% by Volume

1.11

7.9

EXTINGUISHING MEDIA: Dry chemical, CO_2 , or foam. Do not use a solid stream of water that may scatter the flames. Use a water spray to cool metal containers exposed to fire.

This combustible liquid can form explosive mixtures with air when heated. Vapors can flow along surfaces to distant ignition sources and flash back.

Self-contained breathing apparatus is required for those fighting fires in enclosures in which this material is involved.

SECTION 5. REACTIVITY DATA

Methyl n-amyl ketone is a stable material in closed containers at room temperature under normal storage and handling conditions. It does not polymerize.

This material is an OSHA class II combustible liquid. It is incompatible with oxidizing agents, strong acids, and alkalis.

Thermal-oxidative degradation products can include carbon monoxide.

SECTION 6. HEALTH HAZARD INFORMATION | TLV

Methyl n-amyi ketone is not listed as a carcinogen by the NTP, IARC, or OSHA.

Inhalation of methyl n-amyi ketone can irritate the eyes, nose, and throat. Exposure to high concentrations will produce headache, dizziness, and, in extreme cases, unconsciousness, because this material is a central nervous system depressant. Unacclimated individuals may suffer more pronounced effects. Prolonged or repeated contact with the skin can produce irritation and dermatitis.

FIRST AID:

EYE CONTACT: Flush thoroughly with running water (including under eyelids) for 15 minutes.

SKIN CONTACT: Remove contaminated clothing. Wash affected area with soap and water.

INHALATION: Remove victim to fresh air.

INGESTION: Get medical help! * If victim is conscious, and physician is not immediately available, give him milk or water to drink to induce vomiting.

* GET MEDICAL ASSISTANCE = In plant, paramedic, community. Get medical help for further treatment, observation, and support after first aid, if indicated.

SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES

Notify safety personnel of spills. Provide optimum explosion-proof ventilation. Remove sources of ignition. Provide cleanup personnel with protection against contact with liquid and inhalation of vapors. Absorb small spills on paper and evaporate in exhaust hood.

Contain large spills and absorb on vermiculite. Pick up with nonsparking scoop and place in a closed metal container for disposal.

Spills can be flushed with water to remove them from hazardous area; flush them to open area or to ground for evaporation. Prevent discharge into sewers, drains, and waterways.

DISPOSAL: Burn waste material in an approved incinerator or have it disposed of by a licensed disposal company. Follow Federal, state, and local regulations.

SECTION 8. SPECIAL PROTECTION INFORMATION

Provide general and local exhaust ventilation to meet TLV requirements. Exhaust hoods should have a minimum face velocity of 100 linear feet per minute. Exhaust fans and other electrical services must be of explosion-proof construction. For emergency and nonroutine work above the TLV, an approved, full-facepiece, organic-vapor canister gas mask is recommended; but for unknown concentrations or those above about 4000 ppm, self-contained or air-supplied respirators (positive pressure) are needed.

Wear protective clothing, including rubber gloves, apron, etc., to avoid skin contact, and safety goggles or full face shield to protect the eyes from splashes.

Eyewash fountains and safety showers should be available in areas of use and handling.

Use of contact lenses should be prohibited because they pose a special hazard; soft lenses may absorb irritants and all lenses concentrate them.

SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS

Store in tightly closed drums in a clean, cool, well-ventilated area away from heat, ignition, strong acids, alkalies, and oxidizing agents. Containers should be electrically interconnected and grounded for liquid transfers to prevent static sparks. Storage and use areas should be No Smoking areas. Use nonsparking tools. Small amounts should be handled in approved safety cans with proper labeling. Electrical services must meet code requirements.

Avoid skin and eye contact. Avoid breathing vapors. Do not ingest. Wash thoroughly after handling.

DOT Classification: Combustible Liquid

ID No.: UN1110

Label: None

Data Source(s) Code: 1, 2-7, 12, 13, 14, 19, 23, 26, 27, 34, 38, 47, 82, 84. CK

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Approvals *JO. Accroce, 11/86.*

Indust. Hygiene/Safety *JW 10-86*

Medical Review *[Signature]*

Material Safety Data Sheet

Genium Publishing Corporation
1145 Catalyn Street
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(518) 377-8855



No. 425
METHYL n-BUTYL KETONE
(Revision A)

Issued: October 1979
Revised: March 1986

SECTION 1. MATERIAL IDENTIFICATION

20

MATERIAL NAME: METHYL n-BUTYL KETONE

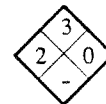
OTHER DESIGNATIONS: MBK; 2-Hexanone; n-Butyl Methyl Ketone; $\text{CH}_3\text{CO}(\text{CH}_2)_3\text{CH}_3$; CAS #0591-78-6

MANUFACTURER/SUPPLIER: Available from several sources, including:
Eastern Chemical Div. of United-Guardian, Inc., PO Box 2500, Smithtown, NY 11787;
Telephone: (516) 273-0900

HMIS

H: 1	R 1
F: 3	I 4
R: 1	S 3
PPE*	K 3

*See sect. 8



SECTION 2. INGREDIENTS AND HAZARDS

%

HAZARD DATA

Methyl n-Butyl Ketone

* ACGIH (1985-86) TLV. OSHA PEL is 100 ppm or 410 mg/m³.

Significant contribution to overall exposure by skin absorption:
G.D. DiVincenzo et al., *Tox. Appl. Pharm.* 36 (1976):511.

8-hr TWA 5 ppm
or 20 mg/m³*

Rat, Oral, LD₅₀: 2590 mg/kg

Rat, Inhalation,
LC₅₀: 8000 ppm/4 hrs.

SECTION 3. PHYSICAL DATA

Boiling Point, 1 atm ... 262.4°F (128°C)
Vapor Pressure @ 38.8°C, mm Hg ... 10
Vapor Density (Air = 1) ... 3.45
Water Solubility @ 25°C, g/100 g H₂O ... 3.5

Specific Gravity, 20/4°C ... 0.810
Volatiles, % ... ca 100
Melting Point ... -134.6°F (-57°C)
Evaporation Rate (nBuAc = 1) ... 0.87
Molecular Weight ... 100.16

Appearance and odor: Clear, colorless liquid. Characteristic acetone-like odor.

SECTION 4. FIRE AND EXPLOSION DATA

LOWER UPPER

Flash Point and Method

Autoignition Temp.

Flammability Limits In Air

77°F (24.9°C) CC

991°F (532.2°C)

Volume %

1.22

8.0

EXTINGUISHING MEDIA: Foam, dry chemical, carbon dioxide. Use water spray to cool metal containers that are exposed to fire.

This material is a moderate fire and explosion hazard when exposed to heat and flame. Its heavier-than-air vapors can flow along surfaces to distant ignition sources and flash back.

Fire fighters should use self-contained breathing equipment when fighting fires in which this material is involved.

SECTION 5. REACTIVITY DATA

Methyl n-butyl ketone is a stable material in closed containers at room temperature under normal storage and handling conditions. It does not undergo hazardous polymerization.

MBK is incompatible with oxidizing agents.

It is an OSHA class IC flammable liquid.

Thermal-oxidative degradation in air can produce toxic vapors and gases, including carbon monoxide (CO).

SECTION 6. HEALTH HAZARD INFORMATION

Methyl n-butyl ketone is not listed as a carcinogen by the NTP, IARC, or OSHA.

MBK can cause nerve damage when excessively inhaled, swallowed, or absorbed through the skin, resulting in a progressive loss of sensitivity from the peripheral nervous system. It is known that MBK is metabolized to 2,5 hexanedione, which appears to act as a neurotoxin that causes nerve fiber (axon) damage (*Neurology* 26 [1976]:919).

The condition appears to be reversible when detected early enough. Excessive inhalation of vapor can irritate the respiratory tract and cause impaired judgment and then narcosis by affecting the central nervous system at high concentration. Liquid contact irritates the eyes and defats the skin. Dermatitis can result from prolonged or repeated contact with liquid. MBK readily penetrates the skin to produce systemic effects. MBK is toxic when ingested.

FIRST AID: Get medical help when overexposed to MBK!* **EYE CONTACT:** Flush with plenty of running water for 15 minutes. Get medical help if irritation persists.* **SKIN CONTACT:** Immediately wash affected area with soap and water.

Remove contaminated clothing. Get medical help for persistent irritation or if large area of skin is affected.

INHALATION: Remove victim to fresh air. Restore or support his breathing if required. Get medical help.*

INGESTION: Get medical help.*

* GET MEDICAL ASSISTANCE = In plant, paramedic, community. Seek medical assistance for further treatment, observation, and support after first aid.

SECTION 7. SPILL, LEAK, AND DISPOSAL PROCEDURES

Notify safety personnel of spills. Provide optimum explosion-proof ventilation. Remove sources of ignition. Provide cleanup personnel with protection against contact with liquid and inhalation of vapors. Absorb small spills on paper and evaporate in exhaust hood.

Contain large spills and absorb on vermiculite or sand. Pick up with nonsparking scoop and place in a closed metal container for disposal.

Spills can be flushed with water to remove them from hazardous area; flush them to open area or to ground for evaporation. Prevent their discharge into sewers, drains, and waterways.

DISPOSAL: Burn waste material in an approved incinerator. Follow Federal, state, and local regulations.

SECTION 8. SPECIAL PROTECTION INFORMATION

Provide general and local exhaust ventilation to meet TLV requirements. Respiratory protection is required for emergency and nonroutine conditions above the TLV. A full-facepiece gas mask with organic vapor canister (or self-contained breathing apparatus) can be used from 50 to 250 ppm; for higher or unknown concentrations, an air-supplied respirator (positive pressure) should be used. Gloves of material resistant to MBK and additional protective clothing (apron, boots, coveralls, etc.) that are appropriate to working conditions must be used to prevent skin contact with liquid. Chemical safety goggles and/or full face shield must be used for eye protection where splashing may occur.

Eyewash stations, safety showers, and washing facilities must be readily available in areas of use and handling.

Clothing contaminated with MBK must be removed promptly and the liquid washed off the skin.

Contact lenses pose a special hazard; soft lenses may absorb irritants and all lenses concentrate them.

SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS

Store in a clean, cool, well-ventilated area away from heat, ignition, and oxidizing agents. Containers should be electrically interconnected and grounded for liquid transfers to prevent static sparks. Storage and use areas should be NO SMOKING areas. Use nonsparking tools. Small amounts should be handled in approved safety cans with proper labeling. Electrical services must meet code requirements.

Avoid skin and eye contact. Avoid breathing vapors. Do not ingest! Wash thoroughly after handling.

Storage must be suitable for an OSHA class IC flammable liquid.

Provide preplacement and periodic medical examinations for workers exposed to MBK with special attention given to the central and peripheral nervous system, the respiratory system, skin, and eyes. Monitor nerve conduction velocity if neuropathy is suspected.

DOT Classification: FLAMMABLE LIQUID.

Data Source(s) Code: 1, 2-4, 6, 7, 10-12, 19, 23, 26, 47, 82, 84, CK

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Approvals *JO Accorco, 11/86.*

Indust. Hygiene/Safety *[Signature]* 9-86

Medical Review *[Signature]* Oct 86

MATERIAL SAFETY DATA SHEET

GENIUM PUBLISHING CORPORATION
1145 CATALYN STREET
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NO. 517

PENTACHLOROPHENOL

DATE October 1983

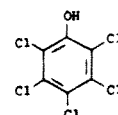
SECTION I. MATERIAL IDENTIFICATION

MATERIAL NAME: PENTACHLOROPHENOL

DESCRIPTION: Wood preservative and fungicide, algicide in cooling towers.

OTHER DESIGNATIONS: PCP, Phenchlorol, Penta, CAS #000 087 865, C_6Cl_5OH

MANUFACTURER: Available from several suppliers.



SECTION II. INGREDIENTS AND HAZARDS

Pentachlorophenol (Purified)*

*Composition varies with each industrial batch.

PCP is about 90% for commercial material with major impurities tetrachlorophenol and hydroxychlorodiphenyl ethers. Low level contamination by certain chlorinated dioxins and dibenzofurans may be responsible for some toxic effects of commercial PCP, such as chloroacne.*

*Current OSHA PEL and ACGIH (1983) TLV. The ACGIH STEL is 1.5 mg/m³. *2,3,7,8-TCDD is not a contaminate.

8-hr TWA 0.5 mg/m³
(skin)**

Human, Oral

LDLo 29 mg/kg

Rat, Oral

LD₅₀ 50 mg/kg

Rat, Inhalation

LD₅₀ 1170 ug/kg

Rat, Oral, 9D preg.

TDLo 60 mg/kg TFX:TB

SECTION III. PHYSICAL DATA

Boiling point, 1 atm deg C (decomposes) - 310 Specific gravity, 22/4C ----- 1.978*

Vapor pressure, mm Hg @ 20C ----- 0.0001 Melting point, deg C ----- 191*

@ 100C ----- 0.12 Molecular weight ----- 266.35

Vapor density (Air=1) -----9.2 Log octanol/water

Solubility in water, ppm @ 20C ----- 14 partition coeff. ----- 5.01

Appearance and Odor: White flake, needle-like crystals or block form; pungent odor only when hot. (Technical grades dark grey to brown). Good warning properties

(irritation of eyes and nose) at 1 mg/m³
*Purified PCP. Values for typical commercial products can be SG1.85 and m.p. 188-189C

SECTION IV. FIRE AND EXPLOSION DATA

Flash Point and Method	Autoignition Temp.	Flammability Limits in Air	Lower	Upper
None*		Not combustible*		

Extinguishing media: Use that appropriate for surrounding fire: Dry chemical, carbon dioxide, foam, water spray. Use water spray to cool fire-exposed containers. When involved in a fire, it emits toxic fumes.

Firefighters should wear self-contained breathing apparatus and full protective clothing.

*The neat material is not combustible. However, wood treating is preformed using 5% PCP soln. in petroleum solvents (mineral spirits, kerosine) which are combustible.

SECTION V. REACTIVITY DATA

This is a stable material in closed containers at room temperature under normal storage and handling conditions. It does not polymerize.

A weak acid which forms salts in alkaline solutions.

Solutions subjected to sunlight or ultraviolet light undergo photochemical degradation.

Thermal-oxidative degradation products include vapors of hydrogen chloride and chlorine-containing compounds.

SECTION VI. HEALTH HAZARD INFORMATION	TLV 0.5 mg/m ³ (skin) (See Sect II)
<p>Unacclimated individuals exposed to dust or sprays (conc. >1.0 mg/m³) can experience irritation to the upper respiratory tract (coughing & sneezing), eyes (tearing) and skin. <u>Readily absorbed through the skin</u> causing systemic injury. The risk of serious intoxication is increased in hot weather. Skin contact causes irritation, dermatitis, and acneform (believed mainly from impurities in PCP). Solutions as dilute as 1% can cause skin irritation upon prolonged or repeated contact. Symptoms from excessive exposure include anorexia, fever, profuse sweating, increased respiration, muscular weakness, hyperglycemia, weight loss and heart failure.</p>	
<p>FIRST AID: <u>Eye Contact:</u> Flush thoroughly with running water for 15 min. including under eyelids. <u>Skin Contact:</u> Remove contaminated clothing! Wash affected area with soap and water. <u>Inhalation:</u> Remove to fresh air. <u>Ingestion:</u> Give several glasses of water to drink. Induce vomiting. Control rising body temp. with ice-cold towels or <u>cold</u> water bath. Get prompt medical help for further treatment, observation and support after first aid.</p>	
SECTION VII. SPILL, LEAK, AND DISPOSAL PROCEDURES	
<p>Notify safety personnel. Provide ventilation. Clean-up workers need full protection against inhalation of vapors and contact with solid or solution. Collect solution spill with absorbent solid and place in metal container for disposal. Wash residue with soap and water. Prevent spills from entering sewers, streams, and open waters. <u>DISPOSAL:</u> Waste material can be buried in an approved landfill or dissolved in a flammable solvent, and burned in an approved, high temperature (>600C) incinerator using an afterburner and scrubber for HCl abatement. Follow Federal, State, and Local regulations. EPA(CWA) RQ is 10 lbs (40 CFR 117); EPA(RCRA) HW No. U242 (40CFR261). AQUATIC TOXICITY TLm 24 (fathead minnow): 0.33 mg/L</p>	
SECTION VIII. SPECIAL PROTECTION INFORMATION	
<p>Provide general and local exhaust ventilation to meet TLV requirements. When needed a chemical cartridge respirator with a dust, mist and fume filter and organic vapor cartridge can be used to 25 mg/m³; a full facepiece is needed >2.5 mg/m³. Approved, self-contained, positive pressure, breathing apparatus can be used to 150 mg/m³. Use impervious gloves, boots, protective clothing, etc. to avoid skin contact with liquid. Use chemical safety goggles with a faceshield if splashing is possible. Contaminated clothing to be removed and laundered before reuse. Showering after workshift with a complete change to street clothes is desirable. Use separated lockers for street clothes. Eyewash stations and washing facilities should be available near use areas. Preplacement and periodic physical exams should emphasize cardiovascular system, eyes, upper respiratory tract, liver, kidneys and skin. Provide training to those working with PCP.</p>	
SECTION IX. SPECIAL PRECAUTIONS AND COMMENTS	
<p>Store in closed containers in a cool, dry, well-ventilated, low fire hazard area away from sources of heat and combustible materials. Protect containers from physical damage. Outside or detached storage preferred. Accumulated sludge at the bottom of dipping tanks may concentrate toxic impurities at much higher levels than original product. Avoid inhalation of vapors, dust or fumes. Avoid eye or skin contact. Do not ingest. Wash thoroughly after handling and follow good personal hygiene practices. PCP can be embryotoxic and teratogenic in test animals. No safe exposure level for pregnant women is established at this time. (See AIHA Journal 43, pp 799-810, 1982). DOT Classification: ORM-E I.D. No. NA2020 Label: POISON</p>	
<p>DATA SOURCE(S) CODE: 2-14,16,20,23,27,31,34,37,38,46-49; DHHS(NIOSH) Publ. #83-106.</p>	
<p>Judgments as to the suitability of information herein for purchaser's purposes are necessarily purchaser's responsibility. Therefore, although reasonable care has been taken in the preparation of such information, Genium Publishing Corporation extends no warranties, makes no representations and assumes no responsibility as to the accuracy or suitability of such information for application to purchaser's intended purposes or for consequences of its use.</p>	<p>APPROVALS: MIS/CRD <i>J. M. Nissen</i></p>
	<p>INDUST. HYGIENE/SAFETY <i>JN</i> 9-8-83</p>
	<p>MEDICAL REVIEW: 17 September 1983</p>

MATERIAL SAFETY DATA SHEET

GENIUM PUBLISHING CORPORATION

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MSDS # 355

PHENOL (Revision B)

Issued: September, 1980

Revised: September, 1985

From Genium's MSDS Collection, to be used as a reference.

SECTION 1. MATERIAL IDENTIFICATION

17

MATERIAL NAME: PHENOL

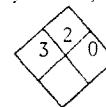
OTHER DESIGNATIONS: Carboic Acid, Hydrobenzene, Oxybenzene, Phenic acid, Phenyl Hydrate, Phenyl hydroxide, Phenylic acid, Phenyl alcohol, CAS #000 108 952, C₆H₅OH

MANUFACTURER/SUPPLIER: Available from many suppliers, including;

Dow Chemical USA

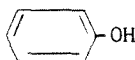
2020 Dow Center

Midland MI 48640 (517) 636-1000



SECTION 2. INGREDIENTS AND HAZARDS

PHENOL



* Current OSHA PEL and ACGIH TLV/STEL (1984-85) (Skin) notation indicates a potential contribution to overall exposure via absorption through the skin.

NIOSH recommends a 10 hr. TWA of 20 mg/m³ with a ceiling of 60 mg/m³ for any 15 minute period.

%

ca 100

HAZARD DATA

8 hr TWA: 5 ppm,
19 mg/m³ (Skin)
STEL: 10 ppm, 38 mg/m³*
Human, Oral LDLo:
140 mg/kg
Rat, oral LDLo:
414 mg/kg
Rat, skin LD50:
669 mg/kg

SECTION 3. PHYSICAL DATA

Boiling Point @ 1 atm 359.4°F (181.9°C)

Vapor pressure @ 25°C 0.35

Vapor density (Air=1) 3.24

Solubility in water (% by wt.) ... 8.4 @ 20°C
(Sol. in all proportion @ temp. >66°C)

APPEARANCE & ODOR: White crystalline solid with a characteristic sharp medicinal sweet, tangy odor which is detectable above 0.05 ppm. Phenol turns pink or red if it contains impurities or if it is exposed to heat or light.

Specific Gravity (H₂O=1):

Solid: 1.017 @ 25/4°C

Liquid: 1.0576 @ 41/4°C

Melting point 109.4°F (43°C)

Volatiles, % by vol @ 20°C .. ca 100

Evaporation rate (BuAc=1) ... <0.03

Viscosity, CPS, @ 80°C 1.51

Molecular weight 94.12

SECTION 4. FIRE AND EXPLOSION DATA

Lower

Upper

Flash Point and Method

Autoignition Temp.

Flammability Limits in Air

175°F (79°C) C.C.

1319°F (715°C)

% by volume

1.5

8.6

EXTINGUISHING MEDIA: Carbon dioxide, dry chemical, or alcohol type foam. Do not use a solid stream of water since the stream will scatter and spread the fire. Use water spray to cool fire-exposed tanks/containers. Phenol presents a moderate fire hazard when exposed to heat, flame, or oxidizers. When heated, it emits toxic fumes and vapors which will form explosive mixtures with air. Solid phenol burns with difficulty, giving off a heavy smoke.

Firefighters should wear self-contained breathing apparatus and full protective clothing when fighting fires involving phenol. NOTE: Water containing phenol can cause severe chemical burns.

SECTION 5. REACTIVITY DATA

This material is stable at room temperature under normal handling and storage conditions. It does not undergo hazardous polymerization. Phenol is incompatible with strong oxidizing agents and halogens. Reaction with calcium hypochlorite is exothermic and produces toxic fumes which may ignite. Hot phenol is corrosive to many metals, including aluminum, lead, magnesium, and zinc. Reaction with these materials causes phenol to become discolored. Do not heat phenol above 122°F (90°C).

Thermal decomposition or burning produces oxides of carbon and water.

SECTION 6. HEALTH HAZARD INFORMATION

TLV 5 ppm or 19 mg/m³ (Skin)

Phenol is a general protoplasmic poison which is corrosive to body tissue. Poisoning can occur via skin absorption, vapor inhalation, or ingestion. Vapors of phenol are irritating to the eyes, nose, and throat. The liquid is rapidly absorbed through the skin. Contact with the skin causes a white wrinkled discoloration followed by a severe burn or systemic poisoning if not properly removed. Intense burning and pain from skin contact may be delayed. Absorption of phenol through skin may cause sudden collapse, or death. Symptoms develop rapidly. When ingested, phenol causes burning of the gastrointestinal tract, and blotches on the lips and in the mouth. Headache, nausea, dizziness, dyspnea, shock, convulsions, and death may follow exposures by any route. Chronic exposure to low concentrations of phenol may cause digestive disturbances, nervous disorders, skin eruptions, and death due to liver and kidney damage. The TLV is set to prevent systemic poisoning.

FIRST AID: **EYE CONTACT:** Immediately flush eyes, including under eyelids, with copious amounts of running water for at least 30 minutes. Get medical attention! (Inplant, community, paramedic). **SKIN CONTACT:** Immediately flush skin for at least 30 minutes while removing contaminated clothing and shoes. Get medical attention! **INHALATION:** Remove victim to fresh air. Restore and/or support breathing as necessary. Keep person warm and quiet. Transport to a medical facility. **INGESTION:** Give victim large quantities of milk or water as quickly as possible. Induce vomiting by touching back of throat with finger. Do not give fluids or induce vomiting if victim is unconscious or is having convulsions. Contact a physician or Poison Control Center and transport to a medical facility.

SECTION 7. SPILL, LEAK AND DISPOSAL PROCEDURES

Notify safety personnel of spills or leaks. Remove all sources of heat and ignition. Provide maximum explosion-proof ventilation. Evacuate all personnel from area, except for those involved in clean-up. Close the leak immediately, if possible. Absorb small spills on paper, vermiculite or other absorbent and place in a closed metal container for disposal. Dike large spills and allow material to cool and solidify. Shovel solid into steel containers for disposal. Flush spill area thoroughly with water and collect flushings and wash water for disposal. Do not allow phenol to enter sewer, watersheds, or waterways! Notify proper authorities including the National Response Center (800-424-8802). Clean-up personnel must wear a self-contained breathing apparatus and full personal protective clothing and equipment. **DISPOSAL:** Burn contaminated waste in an approved incinerator. Phenol may be recovered by charcoal absorption, solvent extraction or steam stripping. A concentration of 1% by weight is required for economical recovery. Phenol is water soluble and is amenable to biological or chemical oxidation. Solutions can be chemically oxidized by chlorine, chlorine dioxide, or other oxidants. Phenol content of water supply not to exceed 0.001 mg/L. (DO NOT flush phenol down drains.) RCRA Hazardous Waste # U188 Reportable Spill quantity ... 1000 lbs.

SECTION 8. SPECIAL PROTECTION INFORMATION

Provide general and local exhaust ventilation (explosion-proof) to meet TLV requirements. When phenol is heated, vapor inhalation can be a serious hazard without proper precaution. For emergency or nonroutine exposures where the TLV may be exceeded, use an appropriate NIOSH-approved full face respirator. Fume hoods should maintain a minimum face velocity of 100 fpm. All electrical service in use or storage areas should have an explosion-proof design.

DANGER! Avoid any contact with this material. Full protective equipment, including splash goggles, faceshield, impervious gloves, apron, boots, impervious shirt and trousers, hard hat with brim, acid suit and respirator should be available and worn as appropriate. Remove contaminated clothing immediately and do not reuse until it has been properly laundered.

Eyewash stations and safety showers should be readily available in use and handling areas.

Contact lenses pose a special hazard; soft lenses may absorb and all lenses concentrate irritants.

SECTION 9. SPECIAL PRECAUTIONS AND COMMENTS

Store in closed containers in a cool, dry, well-ventilated area away from heated surfaces, open flame and ignition sources. Outside or detached storage is preferred. Protect containers from physical damage. Phenol is a very dangerous compound. Do not breathe vapor or allow liquid to come in contact with the skin. Wear appropriate protective equipment and remove contaminated clothing immediately. Use extreme caution when transporting phenol to prevent leaks. Vent containers before heating and do not heat above 140°F (60°C). Do not eat or smoke in areas where this material is being used or handled. Do not allow employees who have diseases of the central nervous system, liver, kidney, or lungs to work in area of phenol exposure. Provide preplacement and periodic medical exams to employees working with phenol. Do not allow untrained workers to handle this material (see also ASTM D2286-Sampling and Handling Phenol).

ICC & DOT - Class B Poison. LABEL: POISON

DATA SOURCE(S) CODE (See Glossary) 2-12, 15, 19, 23-24, 31, 34, 37, 38, 59, 79, R.

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APPROVALS

INDUST. HYGIENE/SAFETY

MEDICAL REVIEW:

JCAccrues 11/85

JW 11-85

JW Dec 85

ATTACHMENT E
DRUM SAMPLING SOP

DRUM SAMPLING SOP

Introduction

Many hazardous waste disposal sites and industrial facilities have containers on-site that may have to be sampled as part of investigations initiated under RCRA and CERCLA programs. These containers, specifically drums, may have a wide range of contents, including all types of inorganic and organic chemicals with a variety of physical and chemical characteristics. Since the opening and sampling of these drums could release toxic vapors or cause a violent reaction, such operations should be handled with the utmost safety precautions.

Preliminary Assessment

Once a decision to sample has been made, the site should be evaluated and the following information obtained:

1. Categorization of drums

The entire number of drums should be assessed and categorized into those containing the same or similar chemicals as well as unknown contents. Each of these categories should be considered as a separate group for sampling purposes.

2. The number, type and condition of drums

Prior to any sampling, the number of drums to be sampled should be determined. Depending on the needs of the program, these drums can be selected by accessibility or randomly. When selecting drums, it is important to select only top bung drums that are in good condition. Deteriorated drums (i.e., rusted, corroded, bulging, etc.) should not be opened or moved as the risk of a rupture or spill is greatly enhanced when dealing with these types of containers.

3. The suitability of the site for a safe and efficient operation

Care should be taken to insure the safety of the surrounding populace by checking proximity of the site to local residences, highways, railroads or other facilities. A contingency plan should be prepared and discussed with all pertinent personnel prior to initiating the operation. The plan should address mitigatory actions in the event of a spill, leak or explosion.

4. Hazards associated with the site

A thorough attempt should be made to ascertain the nature of the material in the drums to be sampled or moved. This can be done in a number of different ways including, review of past analyses, site history, employee and former employee interviews, etc. Any information related to the site should be considered in developing the contingency plan.

Pre-sampling Preparation

A sampling team should be formed based on information gathered in the preliminary assessment and the needs of the program. The sampling team should consist of at least three members, a team leader and two samplers. When possible, a designated safety officer should be included as an additional team member to assist in the development of the sampling and safety plans.

Drum Opening

The selection of a safe drum opening technique should be based on the information available on the contents of the drum. For drums that contain a known substance, the opening procedure may not be as complex as that for drums containing an unknown substance.

1. Containers with known contents

At least two persons should be used to sample drums. The samplers should be equipped with the proper safety equipment to deal with the material in the drum. If there is any doubt as to the nature of the drummed material, the drum should be handled as if the contents are unknown.

Drums with known contents that are not reactive or extremely volatile can be opened by hand with a non-sparking bung wrench. Drums that contain a reactive or volatile compound should be opened with a remote opener.

2. Containers with unknown contents

When opening a drums with unknown contents, it is highly recommended that the drum be opened in an area away from the main drum storage area. Methods for container movement are covered in Technical Methods for Investigation of Sites Containing Hazardous Substances, Technical Monograph No. 20, section 20.4.1.

Samplers that plan to open drums of unknown material should use a remote bung opening device. The personal protective gear for this operation should be at a minimum level B (SCBA and chemical protection suit). EPA's National Enforcement Investigation Center (NEIC) has developed two remote control

drum opening devices, a side penetrating device and a bung remover. For other than emergency response operations, the penetrating device is inappropriate and therefore is not discussed in this SOP.

The bung remover is designed to be used on vertical top bung drums only. The opener should only be used on drums of known integrity, i.e., not rusted or corroded. It is also recommended that the smaller diameter bung be opened first, if possible, as this operation requires less torque.

To set up the apparatus, the drum bracket should be aligned with the wrench bracket directly over the bung to be opened, and fastened securely to the drum. The non-sparking bung socket should then be placed on the bung and the impact wrench fastened into the drum bracket. The sampler should now attach the low pressure air hose to the drill and then return to the low pressure tank. The opening operation requires a short (2-5 second) burst of air from the tank. (The distance from the drum to the low pressure tank is variable depending on length of hose or the predesigned safety area). If the bung has not been loosened, the sampler should return to the drum to recheck the setup.

Some common causes of problems are:

- 1) The drill is loose in its bracket.
- 2) The drill direction is reversed.
- 3) The drum bracket is not aligned properly.

If the set-up seems satisfactory, the drill should set up to remove the larger bung and the operation repeated. If the drum does not open after repeated attempts, another drum should be selected.

Sampling

The sampling method to be used is determined by the physical state of the drummed material (solid, liquid, sludge, etc.). It is important to coordinate the sampling effort with the laboratory. The lab will be able to indicate the amount of sample needed to perform the desired analysis.

1. Liquid Waste

To sample waste, a 4-foot length of glass tube should be used. The inside diameter of the tube will be dependent on the viscosity of the material (for most liquids, 6 to 8 mm I.D. tube should be adequate). To sample, one person should insert the tube into the drum. By sealing the top of the tube with a stopper or thumb, the sampler can extract a sample from the drum. The other sampler should be holding the sample container and assist in transferring the material to the

container. After collecting the sample, the glass tube is broken and placed in the drum.

Note: Sampling personnel should observe if multi-phase liquid layers are in the glass tube. Samples of each phase may be obtained using the same method. This will require separate sample containers for each phase if drum waste characterization is being performed.

2. Sludge Waste

For sludges, a larger bore glass tube may be needed. This may require removing the larger bung. A 40 ml glass vial fastened to a wooden dowel can be used in lieu of a large bore glass tube. The glass tube or vial and dowel should be disposed of properly, e.g., placed in the drum that was sampled, buried on-site, etc.

Note: If the small bung has already been removed, the large bung can be removed with a bung wrench.

3. Solid Waste

Occasionally, a drum containing a solid or granular waste may have to be sampled. These types of drums, often constructed of fiberboard, are easily sampled with a disposable scoop if the drum is an open-top. If the drum is closed, a brass or wood spoon attached to a wooden dowel may be used. To obtain core samples, two tools are recommended: a grain sampler or a sampling trier.

The grain sampler consists of two slotted telescoping tubes, usually made of brass or stainless steel. The outer tube has a conical, pointed tip on one end that permits the sampler to penetrate the material being sampled.

To sample:

1. Insert the sampler in the closed position into the material to be sampled.
2. Rotate the inner tube to open the sampler and wiggle the tube to allow materials to enter the device.
3. Remove the sampler from the material and transfer contents to appropriate sample container.

A typical sampling trier is a long tube with a slot that extends almost its entire length. The tip and edges are sharpened to allow easier penetration into the material to be sampled. The use of the trier is similar to that of the grain

sampler discussed above. However, the trier is preferred when sampling moist media.

To sample:

1. Insert the trier into the waste material at a slight angle and rotate the trier once or twice to cut a core of material.
2. Slowly withdraw the trier, making certain that the slotted portion is facing upward.
3. Transfer the sample to an appropriate container using a brush or spatula.

Only about 20 to 30 grams of this type of material are required for analysis.

Since both of these samplers are reusable, they should be decontaminated (pre-cleaned) in the field using cleanser and water and brought to the lab for solvent washing.

Note: Some of these solid materials may be reactive when exposed to the atmosphere. The sampler should note any changes in the physical characteristics (i.e. heat build-up, color change) of the sample and retreat to a safe area to discuss mitigatory procedures. It is recommended that non-sparking tools be used when sampling granular or solid media.

Drum Closing

After completion of the sampling activities, the drum should be resealed using a bung wrench.

ATTACHMENT F
SOIL SAMPLING SOP

SOIL SAMPLING SOP

This recommended protocol outlines procedures and equipment for the collection of representative samples from surface and subsurface locations.

Surface sampling commonly refers to the collection of samples at a 0-6 inch depth. This is most efficiently accomplished with the use of a trowel or scoop. For samples at lower depths, a decontaminated bucket auger or power auger may be needed to advance the hole to the point of collection. Another clean bucket auger can then be used to collect the sample. For samples at depths greater than three feet, the use of a drill rig and split spoon sampler will be necessary. In some situations, sample locations can be accessed with the use of a backhoe.

Whether surface or subsurface, and whether a bucket auger or drill rig is used to access the sample, several considerations are important during soil sample collection. An attempt must be made to maintain sample integrity by preserving its physical form and chemical composition to as great an extent as possible. First, the mechanism used to advance the hole must be properly decontaminated. The device then used for actual sample collection should not be same as that used to advance the hole. This instrument should be appropriately decontaminated, as should any instrument utilized to transfer the sample into the sample bottle.

Secondly, care must be taken in handling the sample. The sample should be transferred into the sample bottle as quickly as possible, with no mixing, to assure that the volatile fraction is not lost. It is also recommended that for volatile organics analysis of soils, the laboratory performing the analysis should provide wide mouth bottles (4 ounce) for sample collection. This will reduce disturbance of the sample and may help prevent the loss of volatiles.

Soil sampling is generally accomplished through the use of one of the following samplers:

- scoop or trowel
- tulip bulb-planter
- bucket auger
- soil coring device/silver bullet sampler
- waste pile sampler
- power auger (in conjunction with another device)
- split spoon sampler
- Shelby tube sampler

1. Surface Sampling

At the desired location, clear surface debris (e.g., rocks and twigs). Collect an adequate portion of soil from a depth of 0-6 inches, using a trowel or other device listed above. Transfer the sample directly into the sample container. For samples at lower depths, advance the hole using a bucket auger or power auger that has been properly decontaminated. Once at the desired depth, use a clean auger to retrieve the sample. Use a decontaminated spatula or trowel to transfer the sample directly into the sample bottle.

2. Subsurface Sampling

For sampling depths greater than three feet, a drill rig should be employed to advance a borehole to the desired depth. As with the near-surface samples, all down-hole devices must be thoroughly decontaminated. Once the desired depth is reached, a decontaminated sampling device (e.g., a split spoon or Shelby tube sampler) may be advanced by the drill rig. Upon retrieval, the split spoon should be opened, its contents logged if desired, and then immediately transferred into a sample bottle using a decontaminated spatula or spoon. If a Shelby tube is utilized, it should be properly sealed and prepared for shipment.

ATTACHMENT G
EXCAVATION SOP

EXCAVATION SOP

1. Soils - Modes of Failure

Stability is dependent on soil type, which can vary from rock to water-logged, with intermediates such as hard, compact, soft, sandy or filled. Although rock may be assumed stable, certain formations could prove otherwise when cut. For example, shear failure can occur along bedding planes, or due to vibration from plant machinery.

Failure may include:

- o Heave - results from loading (normal or super imposed) on either side of the excavation.
- o Boiling - in high water table/loose conditions.
- o Tension Cracks - may result in slippage or toppling of sides of excavation.
- o Stresses - in unsupported soil could cause bulging followed by subsidence.

2. Hazards

- o Workers may be buried by cave-in (suffocation or crushing). May be fatal.
- o Material, tools, rocks, and soil may fall into excavation if placed too close to edge. Should be no closer than 2 feet.
- o Falls during access/egress, or mounting/dismounting equipment. Stumbling into excavation.
- o Toxic, irritating or flammable atmospheres.
- o Overexertion from handling materials or equipment.
- o Insufficient working room for workers in the excavation. Separation of 12 feet suggested to prevent injury from handling of tools and materials.

3. Causes of Failure

- o Absence of shoring or adequate sloping to sides of excavation.
- o Misjudgment of stability. Decision may be taken against shoring, or shoring may be inadequate for condition.
- o Defective shoring
 - poor material or construction.
 - failure to adequately maintain system after adverse weather and other conditions.
- o Placing material or machinery too close to edge of excavation.
- o Undercut sides. Excavator may not have been level during operation.

4. Shoring

The regulations require shoring at or below a depth of 5 feet (may shortly be reduced to 4 feet). As an alternative, the sides of an excavation may be sloped according to soil conditions. Average conditions require 45°; extreme cases such as loose sand require approximately 26°.

Standard shoring systems consist of:

- a. Vertical Members - Poling or sheeting varying in size from 3" x 4"/2" x 6" to 3" x 6". Poling spaced 4 feet c/c or closer for unstable soil conditions. Interlocked sheet piles are also used.
- b. Horizontal Members - Wales or stringers which bear against sides of excavation or sheeting. These vary in size from 4" x 6" to 6" x 8" at 4 feet c/c spacing vertically and 6 feet c/c horizontally.
- c. Struts or Braces - set against wales used together with cleats and hardwood wedges to keep system in place. Depending on width of excavation, these may be from 2" x 6"/4" x 4" to 10" x 10". Spacing should be 4 feet c/c vertically and 6 feet c/c horizontally. Screw/hydraulic jacks may be used instead of timber struts.

Dismantling Shoring Systems

- o Dismantle from bottom up.
- o Back-fill as close as possible.
- o Use screw jacks if possible during removal of wedged timber members.

Utility and Public Service Lines

- o Care should be taken to avoid damage to these lines. If they are uncovered, they should be adequately protected (including supports) as necessary.
- o Relevant authorities could be requested to identify locations ahead of excavation work.

Exposure to Toxic/Flammable/Explosive Conditions

Precautions should be taken to determine concentrations, and adequate provisions made for ventilation. Avoid introduction of ignition sources. Internal combustion engines can also be a source of contamination. Avoid accumulation of exhaust gases in excavation.

ATTACHMENT Z
SITE SAFETY PLAN
ACKNOWLEDGEMENT FORM

SITE SAFETY PLAN ACKNOWLEDGEMENT FORM

I have been informed and understand and will abide by the procedures set forth in the Safety and Health Plan and Amendments for the Ideal Cooperage site.

Printed Name

Signature

Representing

Date

[illegible]

BRACH, EICHLER, ROSENBERG, SILVER, BERNSTEIN, HAMMER & GLADSTONE

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◇ N. J. & D. C.

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PLEASE RESPOND TO ROSELAND OFFICE

December 21, 1989

Dan Harkay
 U.S. Environmental Protection Agency
 Building 209
 Woodbridge Avenue
 Edison, New Jersey 08837

Re: 39 New York Avenue, Lot 712 Block 10A
 Jersey City, New Jersey

Dear Mr. Harkay:

This letter will confirm our recent telephone conversation regarding the property owned by our clients Richard Pascale and Marie Monck at 39 New York Avenue, Jersey City, New Jersey. As I mentioned to you, we have only recently become involved in this matter on behalf of Mr. Pascale and Mrs. Monck.

I have enclosed the Consent for Access to the property signed by Richard Pascale. As we discussed, Harvey Gerber, the contract purchaser of the property, will be conducting the site characterization work at the property in the near future, pursuant to the terms of the Contract. Therefore, there is no need for the EPA to perform this work. I understand that EPA wishes to have the opportunity to send a representative when any sampling is performed and will want the opportunity to receive split samples. We will inform you when the sampling work is being conducted and otherwise provide EPA with access to the property so that it may oversee necessary site activities.

As part of your review of this site, I suggest you consult with Dr. John Vafai of your Office of Regional Counsel. Pursuant to Dr. Vafai's request, we submitted test results to the EPA on November 3, 1989 covering soil sampling

previously conducted on the property. The results of those tests show only minimal levels of contamination, which is consistent with the uses of the property. As you know, the property owned by our client, which is at the top of a cliff, is entirely separate from the property at the base of the cliff where drum reconditioning operations of Ideal Cooperage were conducted. We have not received a response to our submission to Dr. Vafai.

As we discussed in our conversation, both Mr. Gerber and our clients are anxious to complete any necessary environmental remediation at the property in the near future, and we will be happy to work with you to accomplish that goal.

Very truly yours,

A handwritten signature in black ink that reads "Debora S. Laurano". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

DEBORA S. LAURANO

DSL:iq

cc: Harvey Gerber

CONSENT FOR ACCESS TO PROPERTY

NAME AND ADDRESS OF PROPERTY OWNER:

Mrs. Marie ~~Monk~~ **MONCK**
99 Park Avenue
North Arlington New Jersey 07032

LOCATION OF PROPERTY:

ADDRESS:

39 New York Avenue Jersey City, New Jersey

LOT & BLOCK : 712 10A

I consent to officers, employees and authorized representatives of the United States Environmental Protection Agency (EPA) entering and having continued access to my property for the following purposes:

- the collection of such soil, water and air samples as may be necessary;
- other actions related to the investigation of surface or sub surface contamination;

I understand that the performance of such investigatory measures may require that holes be dug or that the property may be disrupted or disturbed. I also understand that such disruption will be minimized, and that the person(s) responsible for performing the work will make all reasonable efforts to satisfy the mutually agreed to interim measure(s).

I realize that these actions by the USEPA are undertaken pursuant to its response and enforcement responsibilities under the Comprehensive, Environmental Response, Compensation and Liability Act (Superfund), 42 U.S.C.- 9601 et seq.

This written permission is given by me voluntarily.

Dec 12, 1989
Date

Richard C. Pascoe
Signature

BRACH, EICHLER, ROSENBERG, SILVER, BERNSTEIN, HAMMER & GLADSTONE

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

101 EISENHOWER PARKWAY

ROSELAND, N. J. 07068

(201) 228-5700

TELECOPIER

(201) 228-7852

26 EAST 64TH STREET
NEW YORK, N. Y. 10021

(212) 953-9110

December 4, 1990

WILLIAM J. FRIEDMAN □	BRIAN R. LENKER
KEVIN R. BROTZ	ALOIS V. HABJAN °
JOHN J. MIESOWITZ	ANNA L. HACKMAN †
BRUCE KLEINMAN □	MICHAEL I. SCHNECK
CHARLES X. GORMALLY *	DAVID B. KAHAN
SAMUEL N. FAIVUS *	YOLANDA ADRIANZEN
JOHN D. FANBURG *	DAVID S. BERNSTEIN
ALEXANDER J. TAFRO	GEORGETTE J. SIEGEL
JAMES T. DAVIS II	MATTHEW P. ALBANO
ROBIN L. GOLDFISCHER **	STEVEN L. FOX
DAVID A. MEBANE *	DEBORA S. LAURANO
JONATHAN H. BARKHORN *	STEVEN SIBOL °
STEVEN S. POLINSKY	DAVID L. WECHT
ARTHUR L. PORTER, JR. *	KENN R. BIEG
STEPHEN D. LANDFIELD	ROSANNE MARAZITI
TODD C. BROWER	

N. H. BERNSTEIN
WILLIAM L. BRACH
RICHARD J. DRIVER *
BURTON L. EICHLER *
STUART M. GLADSTONE *
ALAN L. GLAZNER *
JOSEPH M. GORRELL *
ALAN R. HAMMER *
ALLAN H. KLINGER
BARRY H. OSTROWSKY
LANCE A. POSNER *
DAVID J. RITTER
PAUL F. ROSENBERG
HARRIS R. SILVER
GEORGE Y. SODOWICK

* N. J. & N. Y.
° N. J. & PA.
† N. J., N. Y. & FLA.
□ N. J., N. Y. & D. C.
** N. J. & D. C.

VIA FEDERAL EXPRESS

PLEASE RESPOND TO ROSELAND OFFICE

Joseph A. Siegel
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

**RE: Former Ideal Cooperage Site,
Jersey City, New Jersey**

Dear Mr. Siegel:

This letter is in response to my receipt of a draft Administrative Consent Order ("ACO") covering the former Ideal Cooperage site located on New York Avenue, Jersey City, New Jersey. As you know, I represent Richard Pascale and his mother, Marie Monck, two of the owners of a portion of the property in Jersey City that was formerly owned by Ideal Cooperage.

The EPA's draft ACO covers a portion of the original Ideal Cooperage Site that you have identified as the "Upper Parcel." As you correctly point out in your draft ACO, it is separated from the "Lower Parcel" portion of the original Ideal Cooperage Site by a substantial cliff. When it was in business, Ideal Cooperage conducted its operations only on the Lower Parcel. The drums that have been identified on the Upper Parcel are apparently the result of an attempt at cleanup of the Lower Parcel by a former owner, as well as "midnight dumping." Our clients had no part in any disposal activities which may have occurred on the Upper Parcel.

Until Ideal Cooperage ceased operations in 1976, the Company had been owned and operated by George Monck, who is now deceased. After the Lower Parcel was sold off, the Upper Parcel passed to Mr. Monck's wife, Marie and to his two sons, John and Richard.

Joseph A. Siegel
December 4, 1990
Page Two

John then died and his ownership interest passed to his wife, Maureen. These three persons currently own the property, although Maureen Pascale has not been named in your draft ACO as a Respondent.

Our two clients, Marie Monck and Richard Pascale, never managed or controlled the operations of Ideal Cooperage, although both did work in the family business. Furthermore, neither Marie Monck nor Richard Pascale have any significant personal assets. In addition to their interest in the property in question, each owns a home, but neither has other assets except for very small current bank accounts, neither of which is believed to be much more than \$1,000. Mrs. Monck, who lives off of social security payments of \$550 per month, has been told that she has terminal cancer. Mr. Pascale drives a truck for a living.

As you know, the New Jersey Department of Environmental Protection ("DEP") has also issued a draft ACO for the same property, calling for a full Remedial Investigation/Feasibility Study at the former Ideal Cooperage property. The cost to carry out the tasks described in the EPA and DEP ACO's would far exceed any current market value of the property. For all of the above reasons, it is impossible and inappropriate for our clients to carry out the tasks listed in the EPA's ACO, or even to contemplate entering into such an ACO.

Instead, if surface and/or subsurface investigations and cleanup actions are deemed necessary at the Upper Parcel of the former Ideal Cooperage Site, I believe that it would be appropriate and efficacious to include in any enforcement action the customers of Ideal Cooperage. If any contamination exists on the Ideal Cooperage property, it presumably resulted from the waste materials of customers who sent drums to Ideal Cooperage for reconditioning. Thus, these customers would be responsible parties under Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §9607(a). I have asked Richard Pascale to search for company records of Ideal Cooperage, which he believes may be located in his mother's basement, in order to compile a list of such customers. I will provide that list to you in the near future.

In summary, any enforcement actions that may be undertaken by EPA involving the Ideal Cooperage property should not include my clients. In addition, it is totally impossible for my clients to undertake or participate in any of the tasks called for under your draft ACO. If any contamination exists on our clients' property, they are the victims of that contamination, rather than the cause.

Joseph A. Siegel
December 4, 1990
Page Three

I will appreciate your anticipated future cooperation
in this matter.

Yours truly,

WILLIAM J. FRIEDMAN

WJF:az/043

CC: Richard Pascale
Michael Schneck, Esq.
Daniel Harkay - EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

NOV 02 1990

William J. Friedman, Esq.
Brach, Eichler, Rosenberg
101 Eisenhower Parkway
Roseland, N.J. 07068

Re: Ideal Cooperage Superfund Site

Dear Mr. Friedman:

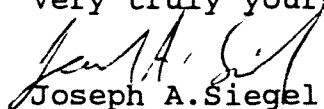
Enclosed please find a draft Administrative Order on Consent ("Order") for the above-referenced site. The Order addresses, among other things, removal of approximately 700 drums at the site and disposal of hazardous materials. As per our telephone conversation of October 31, 1990, EPA seeks performance and financing of the removal by your clients, Marie Monck and Richard Pascale.

In order to expedite negotiations, EPA has set a deadline of November 26, 1990 for receipt of all comments, in writing, regarding the Order. We will soon thereafter contact you regarding your comments. Final signature of the Order is required by December 14, 1990. If this deadline is not met, please be advised that EPA is authorized to fund the removal action and then commence a civil action under Section 107 of CERCLA, 42 U.S.C. §9607 to recover all costs incurred. EPA is also authorized to issue a unilateral order requiring the Respondents to perform and finance the work. If the order is not complied with, the Respondents are liable for penalties up to \$25,000.00 per day for each day of noncompliance under Section 106(b) of CERCLA, 42 U.S.C. §9606(b) and are subject to treble damages under Section 107 of CERCLA, 42 U.S.C. §9607.

Please send your comments and/or any other written response to me with a copy to:

Daniel Harkay, On-Scene Coordinator
United States Environmental Protection Agency
2890 Woodbridge Avenue
Building 209 (MS211)
Edison, NJ 08837
201-321-6614

Very truly yours,


Joseph A. Siegel
Assistant Regional Counsel

cc: Daniel Harkay, RAB-Edison ✓
Susan Monks, ORC-NJSUP

REGION II

-----X
IN THE MATTER OF :
MARIE MONCK :
RICHARD PASCALE, : ADMINISTRATIVE ORDER ON CONSENT
 :
 :
 : Index No. II-CERCLA-10101
 Respondents :
 :
 Proceeding Under Section 106(a) :
 of the Comprehensive Environ- :
 mental Response, Compensation, :
 and Liability Act, as amended, :
 42 U.S.C. §9606(a). :
-----X

JURISDICTION

1. This ADMINISTRATIVE ORDER ON CONSENT (the "Order") is issued to the above named Respondents by the United States Environmental Protection Agency ("EPA") pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), as amended, 42 U.S.C. §9606(a). This authority was delegated to the Administrator of the EPA by Executive Order 12580, dated January 23, 1987, and duly redelegated to the Regional Administrator, EPA Region II. Notice of this Order has been given to the New Jersey State Department of Environmental Protection ("NJDEP"), as required by 42 U.S.C. §9606(a).

2. Respondents Marie Monck and Richard Pascale ("Respondents") agree to undertake all actions required by the terms and conditions of this Order. Respondents agree that they are jointly and severally responsible and shall remain responsible for carrying out all activities required of them under this Order. In the event of the inability to pay of one of the Respondents, or in the event that for any other reason one of the Respondents does not participate in the implementation of this Order, the other Respondent shall complete the work and all applicable requirements of this Order. Respondents consent to and will not contest the authority or jurisdiction of EPA to issue this Order. The Parties agree that this Order is consistent with CERCLA and the National Contingency Plan ("NCP")

at 40 C.F.R. Part 300 and any amendments and modifications thereto.

PARTIES BOUND

3. This Order shall apply to and be binding upon Respondents, their principals, officers, employees, agents, contractors, successors, assigns, and subsidiaries.

FINDINGS

4. The Ideal Cooperage Site-Upper Parcel (the "Site") is located at 39 New York Avenue, in Jersey City, New Jersey and is identified as Block 712, Lot 10A on the current tax map of the City of Jersey City, Hudson County, New Jersey. It is adjacent to the Ideal Cooperage Site-Lower Parcel which is identified as Block 712, Lot 11A and which is separated from Lot 10A by a 50 to 90 foot cliff.

5. The Site includes all real property (and all structures located thereon) which is delineated as Block 712, Lot 10A on the current tax map of the City of Jersey City, Hudson County, New Jersey and all real property into which or under which hazardous substances may have migrated or threaten to migrate.

6. Commercial and industrial zoned properties are located adjacent to the Site. A residential area is located approximately 1,000 feet to the west and northwest of the Site.

7. Ideal Cooperage, a steel drum reconditioning facility, operated on Block 712, Lots 10A and 11A from 1952 to approximately 1981. The Site was primarily used as a drum storage area. Respondents acquired title to the property on November 23, 1984 from Ideal Cooperage Inc. and have been the owners to date. The Site is currently undeveloped and overgrown with vegetation.

8. On April 18, 1985 and November 5, 1985 Harvey Gerber Builders, a prospective purchaser of the Site, conducted a surface and subsurface soil investigation on the Site to identify possible contamination. Laboratory analysis of soil samples collected during the investigations identified volatile organic and petroleum based compounds in the soil at the Site.

9. On May 24, 1988, the NJDEP conducted an inspection of the Site which revealed approximately 600-700 drums. Seventy (70) drums were estimated to contain solid and/or liquid materials. NJDEP recommended implementing a cleanup program to remove all drums from the Site.

10. On December 19, 1988, the NJDEP Metro Bureau of Enforcement referred the Site to the Bureau of Planning and Assessment for review and possible referral to EPA.

11. On February 3, 1989, the NJDEP formally requested EPA to undertake appropriate response action pursuant to CERCLA to determine if the Site qualifies for a removal action.

12. On February 16, 1989, EPA conducted a site visit to confirm the presence of the drums and to ascertain the immediate hazards to the public health and/or the environment.

13. During the month of April 1989, a chain-link fence was installed by the City of Jersey City to minimize trespassing and illegal dumping on the Site. The fence was constructed along the north and east perimeters of the Site.

14. On November 15, 1989, EPA visited the site to collect samples of drummed materials for field and laboratory analysis. Field analysis of the samples identified the solid material to be waxy and organic in nature; liquid in one of the drums was identified to be an acid with a pH less than two. The composite sample, collected from fourteen drums of solid material was analyzed for Target Compound List parameters. The analysis identified semi-volatile organic compounds that included pentachlorophenol, phenol, 2,4,6 trichlorophenol and butyl benzyl phthalate in the sample.

15. The concentrations of the compounds found during the November 15, 1989 visit ranged between 4.8 ppm (butyl benzyl phthalate) to 62 ppm (pentachlorophenyl). The compounds exhibit a range of health effects including carcinogenicity, toxicity through inhalation, ingestion or dermal contact, as well as liver, kidney, and cardiovascular damage. The semi-volatile organic compounds and the acid (pH<2) are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14).

16. The November 15, 1989 site visit revealed that drums had been abandoned on the site and were in a deteriorated condition and that some of the substances within the drums had leaked out onto the ground. This constitutes a release of hazardous substances, pollutants and contaminants into the environment within the meaning of Section 101(22) of CERCLA, 42 U.S.C. §9601(22). Hazardous substances remaining at the site pose a potential for further releases at the site and therefore constitute a threat of release under Section 101(23) of CERCLA, 42 U.S.C. §9601(23).

17. The Site is a "facility" within the meaning of Section 101(20) of CERCLA, 42 U.S.C. §9601(9).

18. Respondents are "owners" within the meaning of Section 101(20) of CERCLA, 42 U.S.C. §9601(20).

19. Respondents are "persons" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. §9601(21) and responsible parties within the meaning of Section 107(a) of CERCLA, 42 U.S.C. §9607(a).

DETERMINATIONS

20. Based upon the FINDINGS set forth above and the entire Administrative Record, EPA has determined that:

21. The release or threatened release of hazardous substances into the environment from the Site may present an imminent and substantial endangerment to the public health, welfare, or the environment within the meaning of Section 106(a) of CERCLA, 42 U.S.C. §9606(a).

22. A response action of the type contemplated by the National Contingency Plan, 40 C.F.R. Part 300 et seq., is required to be taken at the Site to prevent and/or mitigate any potential threat of harm to public health, welfare or the environment caused by the release or threatened release of hazardous substances from the Site.

ORDER

23. Based on the foregoing FINDINGS and DETERMINATIONS, it is hereby ordered and agreed that Respondents will undertake a removal action at the Site in accordance with all of the terms and provisions of this Order. All activities required by this Order shall be completed as soon as possible even though maximum time periods for their completion are set forth herein and in the approved Removal Action Work Plan referred to below.

24. No later than five (5) business days after the effective date of this Order, Respondents shall select an individual to be known as the Facility Coordinator. The Facility Coordinator shall be responsible for the oversight of the implementation of this Order. He or she shall have technical expertise sufficient to oversee properly all aspects of the work pursuant to this Order. Respondents may change its Facility Coordinator after notifying EPA in writing at least five (5) business days in advance.

25. Respondents shall provide the EPA Project Officer with three (3) calendar days advance notice of the commencement of any on-site activities undertaken pursuant to this Order.

26. Respondents shall provide weekly written progress reports to EPA. At a minimum, these progress reports shall: (a) describe all action and activities undertaken toward achieving compliance with this Order, and (b) include all plans and procedures conducted during the preceding week as well as such action and plans which are scheduled for the next week. The later shall include a listing of all laboratories, transporters and disposal facilities (including copies of the manifests) which Respondents intends to use during the next week.

27. Upon completion of the work required under this Order, but before demobilization of equipment at the Site, Respondents shall notify, in writing, the EPA Project Officer of the Respondents' belief that the work has been completed.

a. If EPA determines that the work required under the Order has been completed to EPA's satisfaction then EPA will notify the Facility Coordinator in writing of EPA's determination.

b. If EPA determines that the work required under the Order has not been completed to EPA's satisfaction, then EPA will delineate in writing to the Facility Coordinator the work which EPA believes remains to be performed. Respondents will have an opportunity to meet with EPA to discuss the work to be performed within ten (10) calendar days after receipt of EPA's comments. After that period of time has expired, EPA will make a final determination as to the work which Respondents must perform to comply with this Order. A copy of EPA's determination delineating the work to be performed will then be sent to the Facility Coordinator.

c. If Respondents, in good faith, disagree in whole or in part, with EPA's comments about the remaining work to be performed, Respondents shall notify EPA in writing of its objection as soon as possible, but not later than the expiration of the fourteen (14) calendar day meeting period. The Associate Director for Removal and Emergency Preparedness Programs - EPA Region II (the "Associate Director") will then make a final determination as to any remaining work to be performed and will provide a written response to Respondents setting forth EPA's determination regarding the remaining work to be performed and the basis for that determination. The written determination shall constitute the resolution of the dispute and shall be deemed to be incorporated in this Order. Upon receipt of the EPA's final determination, Respondents shall implement the remaining work to be performed in a timely manner.

d. If a dispute and its resolution, as described in subparagraph b above, cause a delay that makes it impossible for

Respondents to meet a deadline set forth or established pursuant to this Order, then that deadline shall be extended and stipulated penalties stayed by a period of time not to exceed the delay resulting from the dispute and its resolution; PROVIDED, that Respondents shall not be entitled to any such extension if the Associate Director determines that Respondents' disagreement with the work to be performed specified above, is not in good faith or otherwise lacks a reasonable basis.

28. Notwithstanding paragraph 27, EPA shall be the final arbiter of all disputes concerning the sufficiency of the work to be carried out pursuant to this Order, the required contents of all deliverables under the Order, the schedules(s) for performance of any and all work to be performed under this Order, any requests for modification(s) to the terms of this Order and all other matters relating to the performance of work required by this Order and the manner by which such work is to be performed.

DESCRIPTION OF WORK

29. Within thirty (30) calendar days of the effective date of this Order, Respondent shall submit to EPA for review and approval a detailed operations plan (hereinafter, the "Operations Plan" that shall include the following:

- a. Sampling and Analysis Plan
- b. Cleanup Plan
- c. Health and Safety Plan

30. The Sampling and Analysis Plan, shall address the following concerns on the Site:

- a. The presence of hazardous substances in the estimated 700 drums on the Site;
- b. The presence of drums buried on the Site;
- c. The presence of contaminated surface and subsurface soil on the Site, and
- d. The delineation of contaminated surface and subsurface soil, on the Site (if identified)

31. The sampling plan shall include, but need not be limited, to the following:

- a. Maps depicting:
 - i. locations of all soil borings, test pits, drum locations, soil samples; and
 - ii. work and safety zones, including but not limited to: exclusion zones, contaminant reduction zones, drum staging and sampling area, waste storage area(s), and command post, all located from fixed reference points and plotted to scale.
- b. Detailed procedures and methods to be followed during the implementation of the Sampling and Analysis Plan (SAP).
 - i. The SAP should include EPA approved procedures for sampling and analysis of soil and drum samples collected from the site. Samples collected from the drummed materials shall be analyzed for compatibility, disposal characteristics and Target Compound List parameters to identify hazardous substances and for proper treatment and/or disposal methods. All soil samples are to be analyzed for Target Compound List parameters.
 - ii. All sampling and analyses performed pursuant to this Order shall conform to EPA Quality Assurance/Quality Control (QA/QC), Data Quality Objectives for Remedial Response Activities-Development Process-EPA/540/G-87/003, Data Quality Objectives for Remedial Response Activities-EPA/540/G-87/004, and Chain of Custody procedures as directed by the EPA and in conformance with the EPA publication entitled "Test Methods for Evaluating Solid Waste" (SW-846, November 1986 or as updated).
- c. A plan for providing site security, including measures to protect the health and welfare of surrounding residents.
- d. Procedures for excavation and overpacking (as required) of buried drums on-site if necessary. Excavation and trenching should comply with applicable Occupational Safety and Health Administration (OSHA) standards.

- e. Design, construction, operation, and maintenance specifications for all removal activities (if required), on-site; and identification of all equipment to be utilized during site characterization and removal operations.
- f. A Quality Assurance/Quality Control ("QA/QC") Plan and a description of Chain of Custody Procedures to be followed, should be included, which satisfies the following requirements:
 - i. The QA/QC Plan shall be completed in accordance with Section 10 of SW-846, and "Guidance for Preparation of Combined Work/Quality Assurance Project Plans for Environmental Monitoring" (U.S. EPA, Office of Water Regulations and Standards, May, 1984);
 - ii. The Respondents shall use the QA/QC Plan submitted to and approved by EPA pursuant to this Order and shall use standard EPA Chain of Custody procedures, as set forth in the National Enforcement Investigations Center Policies and Procedures Manual, as revised in November 1984, and the National Enforcement Investigations Center Manual for the Evidence Audit, published in September 1981, and SW-846, for all sample collection and analysis activities conducted pursuant to this Order; and
 - iii. If performance of any subsequent phase of the work required by this Order requires alteration of the QA/QC Plan, the Respondents shall submit to EPA for review and approval proposed amendments to the Plan.
- g. A detailed time schedule for performance of specific tasks and for submitting plans and reports to EPA, as set forth in this Order.

32. A Cleanup Plan shall be prepared to address the removal/disposal/treatment of empty drums, contaminated soil and drummed hazardous substances. The cleanup plan shall include the following:

- a. Removal/disposal/treatment of all drummed materials and grossly contaminated soil identified on the site that contains hazardous substances. All disposal/treatment activities must be conducted in an EPA approved manner.

- b. Procedures for temporary storage of waste as it is staged and prepared for treatment and/or disposal, including:
 - i. measures to prevent the exposure of the waste to the elements and nearby population;
 - ii. construction of a containment system to prevent spillage, runoff, and runoff (i.e., dike, berm)
 - iii. measures to prevent the accumulation of liquids from rainfall during pre and post-removal operations; and iv. measures to prevent, contain, and monitor the emission of hazardous vapors (if applicable) during operations.
- c. Waste profile forms shall be completed for all hazardous materials leaving the Site and all hazardous substances removed from the site must be weighed upon departure from the Site and upon arrival at the EPA-permitted treatment/disposal facility. All waste disposal conducted by Respondents pursuant to this Order shall comply with all requirements of CERCLA, including but not limited to Section 121(d)(3), 42 U.S.C. §9621(d)(3), the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901, et. seq. and all the regulations promulgated pursuant thereto, and all other applicable federal and state laws and regulations.
- d. Procedures for decontamination, crushing, and disposal of empty drums.
- e. Decontamination procedures for expendable and nonexpendable equipment.
- f. Procedures for bulking and solidification of drum contents as warranted; and the steps to determine if bulking and solidification is recommended.
- g. Methods and procedures used to confirm that hazardous substances identified on the site, have been remediated, to EPA acceptable levels.
- h. A schedule for the completion of activities proposed in the cleanup plan.

33. A Health and Safety Plan, which shall satisfy the requirements of 29 CFR Part 1910.120 Hazardous Waste Operations

Standards, and EPA's "Standard Operating Safety Guides" (OSWER, 1988). If performance of any subsequent phase of the work required by this Order requires alteration of the Health and Safety Plan, Respondents shall submit to EPA for review and approval proposed amendments to the Health and Safety Plan.

34. If EPA determines that the Operations Plan submitted by Respondent needs to be revised, EPA will revise the Operations Plan or will require Respondents to revise it. If EPA directs Respondents to make modifications to the Operations Plan, Respondents shall make the required modifications and submit the revised Operations Plan to EPA within five (5) business days of the Respondent's receipt of EPA's comments on the Operations Plan. EPA shall remain the final arbiter in any dispute regarding the sufficiency or acceptability of the Operations Plan, and EPA may modify it unilaterally. At such time as EPA determines that the Operations Plan is acceptable, EPA will transmit to Respondent a written statement to that effect. Upon its approval by EPA, the Operations Plan shall be deemed to be incorporated into an enforceable part of this Order.

35. Within ninety calendar (90) days of EPA's approval of the Operations Plan, Respondent shall complete all work described in the Operations Plan and submit a site cleanup report which includes at a minimum the following:

- a. Synopsis of all work performed under this Order, and a certification that all work described in the Operations Plan has been performed.
- b. Explanation of any EPA-approved modifications that occurred during the performance of the work.
- c. Results of all sampling and analyses performed; and (if necessary) the need for additional sampling to further characterize the site;
- d. A list of all laboratories, transporters, haulers and disposal or recycling facilities utilized during the cleanup.
- e. Copies of all manifests; and bills of lading.
- f. Copies of all analytical results, including QA/QC data and chain of custody records.
- g. Copies of all "notices of destruction" of all materials which are disposed off-site.

GENERAL PROVISIONS

36. All work plans, reports and any other documents required to be submitted to EPA under this Order shall be sent by certified mail, return receipt requested, to the following addressees:

United States Environmental Protection Agency
2890 Woodbridge Avenue
Building 209 (MS211)
Edison, NJ 08837
Att. Daniel Harkay, On-Scene Coordinator

1 copy: United States Environmental Protection Agency
26 Federal Plaza - Room 309
New York, N.Y. 10278
Att. Joseph A. Siegel, Ideal Cooperage Site Attorney

Correspondence to be submitted by EPA to Respondents under this Order will be sent to:

...(?)...

37. EPA and its contractors and agents shall have access to all records relating to implementation of the work under this Order. All such records shall be made available to EPA upon request, and all employees of Respondents, including contractors, who engage in any activity under this Order shall be available to and shall cooperate with EPA.

38. All documents produced by Respondents and submitted to EPA in the course of implementing this Order shall be available to the public unless Respondents claims they are confidential and EPA determines that they meet the confidential requirements stated in 40 C.F.R. Part 2, Subpart B and Section 104 of CERCLA, 42 U.S.C. §9604. No sampling, hydrological, geological, soil chemical analyses or ground water quality data relating to the Site shall be considered confidential.

39. All reports, the Operations Plan, and other writings required under the terms of this Order shall, upon approval by EPA, be deemed incorporated into and become a part of this Order.

40. All data and information relating to the implementation of this Order shall be retained by Respondents for a period of ten (10) years after the effective date of this Order and shall be made available to EPA upon request during that period of time.

41. Respondents shall obtain in a timely manner such access to the Site and any other properties necessary to carry out the

requirements of this Order. This Order does not convey any rights of access to Respondents.

42. Respondents shall allow unimpeded access to EPA, its representatives, agents, contractors and consultants and NJDEP to all areas of the Site, into all structures thereon and any other premises under the ownership or control of Respondents where work under this Order is performed. Respondents shall permit such EPA agents to enter and move about the Site at will at all times, and shall allow such officials or agents of EPA to undertake any observations, response actions or any other activities which EPA elects to undertake at the Site at EPA's option.

43. No informal advice, guidance, suggestions or comments by EPA or NJDEP shall be construed to relieve Respondents of any of their obligations under this Order.

44. All contractors and subcontractors Respondents plan to use for work at the Site must have adequate liability coverage or indemnification for any liability which may result from any activities at the Site pursuant to this Order. At least five (5) days prior to commencement of on-site activities by Respondents' contractors and subcontractors, Respondents shall require that their contractors and subcontractors provide to Respondents such documents or other materials which indicate that the contractors and subcontractors have in effect, at the time of commencement of on-site activities and maintain in effect for the duration of on-site activities, liability coverage or indemnification as required in this paragraph.

45. Respondents may request that EPA-approve modification(s) to the EPA-approved Operations Plan at any time during the implementation of the work required by this Order. However, EPA shall have sole authority to make any modification(s) to the EPA-approved Operations Plan and EPA alone shall be the final arbiter of any issues or disputes concerning the Operations Plan and all work which shall be required under this Order. Any and all modifications to the EPA-approved Operations Plan must be approved in a writing signed by EPA.

46. All work conducted pursuant to this Order shall be performed in accordance with prevailing professional standards.

47. All response actions and activities carried out by Respondents pursuant to this Order shall be done in accordance with and consistent with CERCLA, the NCP, all applicable OSHA regulations for worker safety and all other applicable federal, state, local laws, or regulations.

48. Respondents shall be responsible for obtaining all necessary permits, licenses and other authorizations needed to carry out the work required by this Order.

49. The United States Government and any and all agencies thereof shall not be liable for any injuries or damages to any person or property resulting from any acts or omissions of Respondents' officers, directors, employees, contractors, or agents carrying out any activity related to this Order. Respondents shall not represent to anyone that the United States Government or any agency thereof is or may be a party to any contract entered into by Respondents in carrying out any activity pursuant to this Order.

50. Respondents agree to indemnify and hold harmless EPA and the United States Government, its agencies, departments, agents and employees from all claims, causes of action, damages and costs of any type or description by any and all parties for any injuries or damages to any person or property resulting from any acts or omissions of Respondents, its employee(s), agent(s), and/or contractor(s) on any matter(s) related to this Order.

51. Respondents shall use its best efforts to avoid or minimize any delay or prevention of performance of its obligations under this Order. Respondents shall provide written notification to the EPA Region II On-Scene Coordinator when Respondents discover any circumstances which have caused or which Respondents believe are likely to cause a delay in complying with the terms of this Order. Such written notice shall be provided as soon as possible, but not later than three (3) calendar days after the date when Respondents either discovered or should have discovered such circumstances. Such notification, however, does not relieve Respondents of any obligation(s) under this Order. Upon receipt of this notice, EPA may: (a) order Respondents to cease performing work pursuant to this Order; (b) order Respondents to undertake additional measures at the Site; (c) initiate response action(s) with federal funding; and/or (d) elect to take any other measures which are authorized under applicable law(s) or regulations(s).

52. Respondents agree to reimburse EPA for all costs (including all direct and indirect costs) which have been incurred or will be incurred by EPA and all of its agents, contractors and employees relating to this Order.

a. Respondents understand that EPA personnel, and/or EPA contractors, subcontractors or designated representatives shall be present at the Site to oversee field work performed pursuant to this Order and that costs incurred as a result of their activities related to this Order (and any other costs incurred by EPA) will be reimbursed by Respondents upon a demand in writing by EPA to Respondents;

b. After a demand in writing from EPA for

reimbursement of costs incurred by EPA relating to this Order, Respondents may request documentation from EPA to account for all such costs incurred by EPA and/or its agents, contractors and employees prior to reimbursement to EPA. Any such request by Respondents must be in writing and must be received by EPA within thirty (30) calendar days after the date on the demand letter from EPA;

c. Respondents will reimburse EPA for all costs, as stated above, within sixty (60) calendar days after the date on the letter from EPA to Respondents which demands that Respondents pays such costs. This payment will be made regardless of whether Respondents has requested an accounting for these costs from EPA as specified in subparagraph b above; and

d. All payments by Respondents to EPA pursuant to the terms of this Order shall be in the form of a cashier's check or a certified check made out in the amount demanded by EPA and made payable to "Hazardous Substances Superfund." All such checks shall be mailed to the following address within the time stipulated in subparagraph c above:

EPA-Region II
P.O. Box 360188M
Pittsburgh, PA 15251
Att: Superfund Accounting

All such payments shall be accompanied by a letter stating the name and address of Respondents, the name of the Site, and the number on this Order. A copy of the letter and check must also be sent to the EPA representatives noted in paragraph 36.

53. Any failure by Respondents to carry out any terms of this Order may result in EPA unilaterally taking the actions required under this Order pursuant to Section 106 of CERCLA, 42 U.S.C. §9606.

54. Any failure by Respondents to comply with any provision in this Order, including, but not limited to, any failure to comply with any terms of the EPA-approved Operations Plan which is to be prepared pursuant to this Order, will be considered a violation of this Order. In such an event, EPA may elect to:

- a. demand that Respondents ceases work under the Order;
- b. use federal funds to complete the work required by the Order; and/or
- c. take any other action(s) authorized under applicable law(s) or regulation(s).

55. Nothing stated in this Order shall preclude EPA from taking any additional enforcement action(s), and/or any other action(s) as it may deem necessary for any purpose, including the prevention or abatement of an imminent and substantial endangerment to the public health or welfare or the environment arising from conditions at the Site.

56. If Respondents fails to comply with any of the terms or time limits set forth in or established pursuant to this Order, Respondents shall pay a stipulated penalty to EPA in the amount(s) indicated below for each day of noncompliance:

<u>Days After Required Date</u>	<u>Daily Stipulated Penalty</u>
1 to 10 days	\$1000/day
11 to 20 days	\$2000/day
21 days or more	\$3000/day

Any such penalty shall accrue as of the first calendar day after the applicable deadline has passed and shall continue to accrue until the noncompliance is corrected to the satisfaction of EPA. Such penalties shall be due and payable ten (10) calendar days after the date on any written demand from EPA. Or if no such demand is received, on the first day of each and every month following the date the penalty accrues until such noncompliance is corrected. Payment of any such penalties to EPA shall be made payable to the "Hazardous Substance Superfund" in the same manner as stated in Paragraph 56(d) above.

57. Nothing contained in this Order shall affect the right of EPA to initiate an action against Respondents (or any other responsible party) pursuant to Section 107 of CERCLA, 42 U.S.C. §9607, for recovery of any costs incurred by EPA relating to this Order and/or for of any other response costs which have been incurred or will be incurred by the United States relating to this Site.

58. Nothing in this Order shall affect the right of EPA to enter any other Order on Consent and/or issue any other Order unilaterally to Respondents (and/or any other responsible party for the Site) pursuant to CERCLA or any other applicable law to require the performance of any additional response actions which EPA determines are necessary for this Site.

59. Nothing herein shall act as a bar to, a release of, a satisfaction of or a waiver of any claim or cause of action which EPA has at present or which EPA may have in the future against any entity, including Respondents, on any matters relating to this Site.

60. Nothing herein is intended to mean that Respondents

is the only responsible parties with respect to the release or threatened release of hazardous substances from the Site.

61. Nothing contained in this Order shall affect any right, claim, interest, defense, or cause of action of EPA with respect to any entity which is not a party to this Order. Nothing in this Order constitutes a decision on pre-authorization or approval of funds under Section 111(a)(2) of CERCLA, 42 U.S.C. §9611(a)(2).

62. Respondents agree not to make any claim(s) pursuant to Sections 106(b)(2), 111 and/or 112 of CERCLA, 42 U.S.C. §§9606(b)(2), 9611, and/or 9612, either directly or indirectly, for reimbursement from the Hazardous Substances Superfund for any costs incurred by Respondents in complying with the terms of this Order.

63. The provisions of this Order shall be satisfied when Respondents receive a written notice signed by the Associate Director which states that all the actions required by this Order have been satisfactorily completed.

64. This Order shall become effective on the date it is signed by the Regional Administrator of EPA Region II as indicated below. All deadlines for activities required pursuant to this Order shall be calculated from this effective date.

For: U.S. ENVIRONMENTAL PROTECTION AGENCY

CONSTANTINE SIDAMON-ERISTOFF
Acting Regional Administrator
U.S. Environmental Protection Agency
Region II

DATE

CONSENT

Marie Monck, by her signature below, agrees to enter into this Order and to be bound by its terms.

MARIE MONCK

DATE

Richard Pascale, by his signature below, agrees to enter into this Order and to be bound by its terms.

RICHARD PASCALE

DATE

IDEAL COOPERAGE

Potential Health Effects For Hazardous Substances

	1. CARCINOGENIC								
		2. TERATOGENIC							
			3. MUTAGENIC						
				4. TOXIC BY INHALATION, INGESTION, OR DERMAL CONTACT					
					5. CENTRAL NERVOUS SYSTEM EFFECTS				
						6. EYE, SKIN, RESPIRATORY OR MUCOUS MEMBRANE IRRITANT			
							7. LIVER DAMAGE		
								8. KIDNEY DAMAGE	
									9. CARDIOVASCULAR DAMAGE
Pentachlorophenol		X		X	X	X	X	X	X
Phenol				X		X	X	X	
2,4,6 Trichlorophenol	X				X				
Butyl Benzyl Phthalate						X			
Chrysene	X					X	X		
Acid				X	X	X		X	

NOTICE OF PUBLIC AVAILABILITY
THE UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION II
ANNOUNCES THE AVAILABILITY OF THE
ADMINISTRATIVE RECORD
IDEAL COOPERAGE SITE
JERSEY CITY, HUDSON COUNTY, NEW JERSEY

The U.S. Environmental Protection Agency (EPA) announces the availability for public review of files comprising the administrative record for the selection of the removal action at the Ideal Cooperage Site, 3-25 New York Avenue, Jersey City, New Jersey. EPA seeks to inform the public of the availability of the record file at this repository and to encourage the public to comment on documents comprising this administrative record.

The administrative record file includes documents which form the basis for the selection of a removal action at this site. Documents now in the record files include project sampling plans, work plans, health and safety plans, analytical results, and other technical reports.

The administrative record file is available for review during normal business hours at:

Jersey City Public Library
Five Corners Branch
678 Newark Avenue
Jersey City, New Jersey 07306

and

U.S. EPA - Region II
Removal Program Office
Woodbridge Avenue
Edison, New Jersey 08837

Additional information is available at the following locations:

Guidance documents and technical literature	-	Central Library U.S. EPA Region II Removal Program Office Woodbridge Avenue Edison, New Jersey 08837
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Written comments on the Administrative Record should be sent to:

Mr. J. Daniel Harkay
On-Scene Coordinator
Removal Action Branch
U.S. EPA Region II
2890 Woodbridge Avenue
Edison, New Jersey 08837

Barrels to be rolling from hillside dump

Authorities not certain about contents left by cooperage company 10 years ago

By Dan Rosenfeld
Journal staff writer

The barrels won't be rolled out for at least two weeks, but the long-awaited cleanup of the Ideal Cooperage toxic site on the Jersey City-Hoboken border began yesterday.

Between 600 and 700 chemical drums litter the 1.3-acre site which hugs the Palisades along Ravine Road. Since Ideal Cooperage closed in 1981, officials and residents have been trying to have the area cleaned.

Environmental officials are unsure of the quantities and types of chemicals at the site, but at least 14 drums contain volatile liquids. City environmental officials said about 30 barrels filled with explosive and flammable paint thinner had been found.

"Our preliminary inspection is that the majority of the barrels are empty," said Dan Harkay, federal Environmental Protection Agency on-scene coordinator. "The historical data is that Ideal Cooperage was a barrel reconditioner, so they were dealing with mostly empty barrels."

Four EPA workers began cutting brush and hauling garbage to clear the area so that environmental workers wearing protective suits can get near the 55-gallon drums. All the drums should be removed within two months, Harkay said.

"We're putting in some test pits,"

Harkay said. "Rumor has it that there are drums buried."

Ideal Cooperage operated on the site from 1952 to 1981 before going bankrupt. Richard Pascale, of North Arlington, and Maria Monch, who died three months ago, owned the company but do not have the money to pay for the \$250,000 cleanup, said Kim Helper, an EPA spokeswoman.

The money will come from the federal Superfund, established for the nation's most contaminated areas. A disposal method for the material has not been chosen.

"It's not a screaming emergency, although there are some hazardous materials present in the drums," Harkay said. "I think it represents a minimal risk for the adjacent residents."

The decision to remove drums from the site was not connected to last month's Aetna Street fire, which sent giant clouds of toxic black smoke through much of the metropolitan area, Helper said.

Earl "Tex" Aldredge, a former Jersey City environmental inspector, brought the site to the city's attention in 1983. City officials then contacted the state Department of Environmental Protection to begin a cleanup. The DEP turned over the job to the EPA in February, 1989.

"It was a referral from the DEP," Helper said. "It hadn't been on the (priority) list."



Journal photo by Larry Cutchall

A sign at the edge of the Ideal Cooperage site warns passers-by they will be better off to keep walking. The site became a favorite dumping ground because of the isolation occasioned by its contamination.

TECHNICAL SOURCES AND GUIDANCE DOCUMENTS

The technical sources and guidance documents listed below are on file in the administrative records file area at the Region II offices located at 2890 Woodbridge Avenue, Edison, New Jersey. These reference materials are available for public review during normal business hours. For more information, please contact Norman Vogelsang, Region II Administrative Records Coordinator at (908) 321-4346.

- o Glossary of EPA Acronyms.
- o Superfund Removal Procedures - Revision #3.
OSWER Directive 9360.0-03B, February 1988.
- o Hazardous Waste Operations and Emergency Response.
Notice of Proposed Rulemaking and Public Hearings.
29 CFR Part 1910, Monday, August 10, 1987.
- o Guidance on Implementation of Revised Statutory Limits
on Removal Action.
OSWER Directive 9260.0-12, May 25, 1988.
- o Redelelegation of Authority under CERCLA and SARA.
OSWER Directive 9012.10, May 25, 1988.
- o Removal Cost Management Manual.
OSWER Directive 9360.0-02B, April, 1988.
- o Emergency Response Cleanup Services Contracts
Users Manual.
OSWER Directive 9242.2-01B, October, 1987.
- o Field Standard Operating Procedures (FSOP).
 - #4 Site Entry
 - #6 Work Zones
 - #8 Air Surveillance
 - #9 Site Safety Plan
- o Standard Operating Safety Guides - U.S. EPA Office
of Emergency and Remedial Response, July 5, 1988.
- o CERCLA Comprehensive Environmental Response,
Compensation, and Liability Act of 1980 (Superfund).
- o SARA: Superfund Amendments and Reauthorization
Act of 1986.
- o NCP: National Oil and Hazardous Substances Pollution
Contingency Plan.

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